

Cabinet Agenda

Members of Cabinet:

Cllr S A Vincent Chairman (Leader)	Policy
Cllr T M Mancini-Boyle (Deputy Leader)	Finance
Cllr J K Copplestone	Economic Development
Cllr J J Emsell	Transformation and Organisational Development
Cllr S Lawn	Planning
Cllr J Leggett	Environmental Excellence
Cllr F Whymark	Housing and Wellbeing

Date & Time:

Tuesday 6 July 2021 6.00pm

Place:

Council Chamber, Thorpe Lodge, 1 Yarmouth Road, Thorpe St Andrew, Norwich

Contact:

James Overy tel (01603) 430540 Email: james.overy@broadland.gov.uk
Website: www.broadland.gov.uk

PUBLIC ATTENDANCE:

This meeting will be live streamed for public viewing via the following link:

<https://www.youtube.com/channel/UCZciRgwo84-iPyRImsTCIng>

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Rules on Public Speaking

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committee.services@broadland.gov.uk

Public speaking can take place:

- Through a written representation (which will be read out at the meeting)
- In person at the Council offices

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All those attending the meeting in person must, sign in on the QR code for the building and promptly arrive at, and leave the venue. The hand sanitiser provided should be used and social distancing must be observed at all times. Further guidance on what to do on arrival will follow once your public speaking registration has been accepted.

AGENDA

1. **To receive declarations of interest under Procedural Rule no 8** **5**
2. **Apologies for absence**
3. **Minutes of meeting held on 15 June 2021** **7**
4. **Matters arising therefrom (if any)**
5. **Public Speaking**

To consider representation from the members of the public who have expressed the wish to convey their views on items on this Agenda.

In accordance with the Constitution a period of 3 minutes is allowed per member of the public.
6. **Representations from Non-Cabinet Members**

To receive the views from non-Cabinet Members on items on this agenda. Members are reminded to advise the Leader if they wish to attend and speak at the meeting.

In accordance with the Constitution a period of 3 minutes is allowed per non-Cabinet Member.
7. **Overview and Scrutiny Committee** **19**

To receive the minutes of the meeting held on 15 June 2021.

The Cabinet will be advised of views expressed by the Committee at its meeting on 29 June 2021 in relation to items on this Agenda.
8. **Place Shaping Policy Development Panel** **246**

To receive the Minutes of the meeting held on 28 June 2021.
9. **Capital Budget** **27**

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17.	Exclusion of the Press and Public	
	The Chairman will move that the press and public be excluded from the meeting for the remaining items of business because otherwise, information which is exempt information by virtue of Paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972, as amended by The Local Government (Access to Information) (Variation) Order 2006, would be disclosed to them.	
18.	Shared Procurement Service Business Case	170
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Trevor Holden
Managing Director

DECLARATIONS OF INTEREST AT MEETINGS

When declaring an interest at a meeting Members are asked to indicate whether their interest in the matter is pecuniary, or if the matter relates to, or affects a pecuniary interest they have, or if it is another type of interest. Members are required to identify the nature of the interest and the agenda item to which it relates. In the case of other interests, the member may speak and vote. If it is a pecuniary interest, the member must withdraw from the meeting when it is discussed. If it affects or relates to a pecuniary interest the member has, they have the right to make representations to the meeting as a member of the public but must then withdraw from the meeting. Members are also requested when appropriate to make any declarations under the Code of Practice on Planning and Judicial matters.

<p>Have you declared the interest in the register of interests as a pecuniary interest? If Yes, you will need to withdraw from the room when it is discussed.</p>
<p>Does the interest directly:</p> <ol style="list-style-type: none"> 1. affect yours, or your spouse / partner's financial position? 2. relate to the determining of any approval, consent, licence, permission or registration in relation to you or your spouse / partner? 3. Relate to a contract you, or your spouse / partner have with the Council 4. Affect land you or your spouse / partner own 5. Affect a company that you or your partner own, or have a shareholding in <p>If the answer is "yes" to any of the above, it is likely to be pecuniary.</p> <p>Please refer to the guidance given on declaring pecuniary interests in the register of interest forms. If you have a pecuniary interest, you will need to inform the meeting and then withdraw from the room when it is discussed. If it has not been previously declared, you will also need to notify the Monitoring Officer within 28 days.</p>
<p>Does the interest indirectly affect or relate any pecuniary interest you have already declared, or an interest you have identified at 1-5 above?</p> <p>If yes, you need to inform the meeting. When it is discussed, you will have the right to make representations to the meeting as a member of the public, but you should not partake in general discussion or vote.</p>
<p>Is the interest not related to any of the above? If so, it is likely to be an other interest. You will need to declare the interest, but may participate in discussion and voting on the item.</p>
<p>Have you made any statements or undertaken any actions that would indicate that you have a closed mind on a matter under discussion? If so, you may be predetermined on the issue; you will need to inform the meeting, and when it is discussed, you will have the right to make representations to the meeting as a member of the public, but must then withdraw from the meeting.</p>

**FOR GUIDANCE REFER TO THE FLOWCHART OVERLEAF.
PLEASE REFER ANY QUERIES TO THE MONITORING OFFICER IN THE FIRST
INSTANCE**

DECLARING INTERESTS FLOWCHART – QUESTIONS TO ASK YOURSELF



Minutes of a meeting of **Cabinet** held at Thorpe Lodge, 1 Yarmouth Road, Thorpe St Andrew, Norwich on **Tuesday 15 June 2021** at **6.00pm** when there were present:

Cllr S A Vincent – Policy (Chairman)

Portfolio holders:

Cllr J K Copplestone	Economic Development
Cllr J J Emsell	Transformation and Organisational Development
Cllr S Lawn	Planning
Cllr J Leggett	Environmental Excellence
Cllr T M Mancini-Boyle	Finance
Cllr F Whymark	Housing and Wellbeing

Cllr M Murrell and Cllr S Riley also attended the meeting.

Also in attendance were the Managing Director, Director Place, Director Resources, Director People and Communities, Chief of Staff and Monitoring Officer, Assistant Director Finance, Assistant Director Individuals and Families, Strategy and Programme Manager, Housing Standards Senior Manager, Senior Finance Business Partner and the Democratic Services Officers (LA, JO).

1 DECLARATIONS OF INTEREST UNDER PROCEDURAL RULE NO 8

Member	Minute No & Heading	Nature of Interest
Cllr J Leggett	9 - Bid to the Community Infrastructure Fund from Sprowston Town Council	Non pecuniary, Vice Chairman of Sprowston Town Council
Cllr F Whymark	9 - Bid to the Community Infrastructure Fund from Sprowston Town Council	Non pecuniary, member of Rackheath Parish Council which had received a loan from the Community Infrastructure Fund

2 MINUTES

The Minutes of the meeting held on 20 April 2021 were confirmed as a correct record.

3 MATTERS ARISING

Minute No: 223 – Environmental Excellence Policy Development Panel

The Portfolio Holder for Environmental Excellence informed members that the Environmental Coordinator was in post and had made a good start to implementing the Environmental Strategy Action Plan.

Minute No: 225 – Social Prescribing

The Portfolio Holder for Housing and Wellbeing advised the meeting that the two Community Connectors who would be undertaking the social prescribing programme were now in post.

Minute No: 228 – Member IT

Cabinet was informed that all members had now been migrated to Office 365. A survey would shortly be held and a report with its findings would be drafted and reported to Cabinet in October.

Minute No: 233 St Faiths Common - Lease

The Portfolio Holder for Economic Development advised Cabinet that the Broadland Country Park scheme was going very well and staff were doing an excellent job.

4 REPRESENTATIONS FROM NON CABINET MEMBERS

The Chairman agreed that, at his discretion, all non-Cabinet Members in attendance be allowed to join the debate at the relevant point of the proceedings on request.

5 OVERVIEW AND SCRUTINY COMMITTEE

The Chairman of the Overview and Scrutiny Committee advised Members on the views expressed by the Committee when it reviewed the Cabinet Agenda on 8 June 2021, as each item was considered.

6 WELLBEING POLICY DEVELOPMENT PANEL

Cabinet received the Minutes of the meeting of the Wellbeing Policy Development Panel held on 12 May 2021.

7 COVID-19 RECOVERY PLAN

The Director for People and Communities introduced the report, which provide an update on the proposed actions contained within the new Covid-19 Recovery Plan 2021-2022.

The report explained that since the start of the pandemic the Council had received a range of funding streams to support an effective recovery for communities and businesses. The allocation of a number of projects had already been agreed and the Recovery Plan appended to the report provided more detail of these activities. The report also identified further actions that required member approval before being taken forward. Members were asked to note that allocations for these items in the report were indicative, as there remained a need to be reactive and responsive to changing circumstances. It was confirmed, however, that any joint costs would be subject to a 45/55 split.

The Leader thanked officers for putting together the report which was a useful means of understanding the many funding streams that had had been received by the Council and how they had been allocated across the District. He welcomed clarification about the 45/55 split and suggested that in future iterations of the report it would be useful to have the total number in the resources column in Appendix A, rather than just the split number, to show how much was actually being spent.

Members welcomed the report, which set out clearly a very complex range of funding streams and allocations and officers were commended for their work in bringing the actions forward.

In answer to a question about hybrid meetings the Director of Resources advised the meeting that the legal challenge to allow a continuation of remote meetings had failed and, therefore, it remained a statutory duty that formal decisions be made in person. The Council had, however, invested in technology to allow meetings to be live streamed and it might be possible to allow members to join remotely in the future, subject to a change in legislation.

In answer to a question about recruiting Mental Health staff, the Director for People and Communities advised the meeting that the Council had engaged with the YMCA to provide mental health support for young people and it was aimed to get a programme in place as soon as possible.

Following a show of hands it was unanimously

RESOLVED:

1. To consider and approve the proposed actions as set out in the attached Covid-19 Recovery Plan 2021-2022;

2. To approve the indicative sums set out in Appendix A and the table at 4.4 to provide further support to the Covid-19 recovery, and to delegate to the relevant Director, in consultation with the appropriate Portfolio Holder in order to utilise the funding flexibly and to ensure the greatest impact.

Reasons for decision

To allocate Covid-19 funding to support residents and businesses in the District.

8 BID TO THE COMMUNITY INFRASTRUCTURE FUND FROM SPROWSTON TOWN COUNCIL

The Director for Place introduced the report, which presented a bid from Sprowston Town Council for a loan of £250,000 from the Community Infrastructure Fund (CIF) to enable the renovation of the former Viking Public House into a multi-use community hub. The CIF enabled parishes to bring forward community infrastructure projects ahead of receipt of their Community Infrastructure Levy (CIL).

If the bid was approved it would leave £43,000 in the CIF. However, the Fund was being constantly replenished by CIL being paid off against previous loans.

It was considered that the loan was reasonable and met the criteria for the use of CIL receipts and that there was no foreseeable risk that the loan would not be repaid, as the Town Council was scheduled to receive in excess of £2m in CIL over the next two years.

The Portfolio Holder for Environmental Excellence thanked the Community Infrastructure Officer, for her help in putting this bid together for a community hub that would be an asset to the area.

The Leader welcomed the bid and emphasised that it was for such projects that the Fund had been established. He add that he would encourage further bids to come forward even if the Fund had been used up as the Council's reserves could be used to provide loans these, if necessary.

Following a show of hands it was unanimously

RESOLVED:

1. To utilise the CIF to enable STC to bring about the timely purchase of the former Viking Public House, Tills Road, Sprowston to enable

conversion into a new multi-use community hub;

2. To agree a £250,000 loan from the Community Infrastructure Fund to Sprowston Town Council;
3. To authorise the Director of Place to draft a legal agreement in accordance with the heads of terms referred to in paragraph 4.5.

Reasons for decision

To bring forward a community infrastructure project in the District.

QUARTER 4 STRATEGIC PERFORMANCE AND FINANCE

The Director for Resources introduced the report, which provided an overview of the performance of the Council in Quarter 4 against the key outcomes set out in the Delivery Plan for 2020/21.

The detail of the financial outturn for the period was broken down into the response and impact of the pandemic on substantive services and the usual outturn with regard to Council services.

The response saw the Council providing direct financial support to individuals and businesses of over £40m. The majority of this funding had been spent, but £1.233m remained and it was proposed that this be allocated to an earmarked reserve in order to deliver an appropriate response to the pandemic in 2021/22.

The impact on the Council's services had been mixed; with some income streams being impacted negatively, such as Carrowbreck which had been forced to cease training and some income streams being impacted positively, such as recycling credits, which had increased with many more people at home during lockdown. Some projects had also slipped to 2021/22, such as staff training because they could not be delivered in year due to Covid. In total, the underspend for 2020/21 was £1.333m.

The Portfolio Holder for Finance noted the enormous amount of work that had been done to support residents and businesses in the District and that it was the right thing to do to carry forward the underspend on substantive services. She also commended the Environmental Projects Reserve, which was an exciting prospect.

The Strategy and Programme Manager introduced the Performance section of the report. She highlighted the 12 measures that had met the year-end success criteria and were rated green.

These included:

Number of working days taken to process new claims for Housing Benefit/Council Tax benefit. Throughout the year there had been a 70 percent increase in new claims however the One Team had exceeded its target of processing new claims within seven days.

Number of affordable homes delivered (including help to buy). A further 64 new build affordable homes had been completed in Q4 bringing the cumulative total for new affordable homes in the District to 165 in 20/21.

Measures that were currently not meeting the year-end target or had missed the target by a narrow margin, were rated amber and included:

Collection Rate of Council Tax. The collection rate, whilst not reaching the target, had exceeded expectations considering the challenges faced during to the Covid-19 pandemic, which was extremely positive.

Percentage of household waste recycled. Although Q3 saw a decrease of four percent, Broadland continued to have the highest total recycling rate in Norfolk at an average of 50 percent.

Light touch monitoring was in place for measures rated Amber.

Measures that had not met the year-end target by a significant amount were rated Red and would be closely monitored, these included:

Collection of Business Rates. Collection performance had been impacted by the Covid-19 pandemic. Whilst some sectors such as retail had benefited from additional help through emergency Business Rate Relief, other sectors had not had the same form of assistance. The Team had worked proactively with businesses to offer extended and deferred payments where appropriate.

Employment rate. The fall in the employment rate reflected the first national lockdown and job losses as a result. However, the Bank of England was predicting that Britain was on track for the strongest growth since the Second World War this year, with a faster-than-expected recovery from the Covid-19 pandemic. To support a fast recovery, officers were undertaking a number of measures to address the threat of increased unemployment. These include acting as a lead partner in the Government's Kickstart scheme.

There were also nine other measures that were currently being baselined to gather data and set targets.

The Portfolio Holder for Transformation and Organisational Development noted that the report clearly demonstrated how well the Council was

performing despite the unprecedented circumstances brought about by the pandemic. He welcomed the further measures that were being baselined for the next year.

The Portfolio Holder for Finance noted that the collection rates of Council Tax and Business Rates were extremely positive considering the extreme challenges faced over the last year.

The Leader concurred with this view and noted the excellent work that had been carried out by the One Team during these difficult times. He added that the reason that it was proposed to drop Quarter 3 from the reporting schedule in March was that this was when Cabinet were looking at the year-end outrun which could be confusing, as members would be looking at an out of date report. Performance reporting had originally been made for Quarters 2 and 4 and it was felt that it would be more efficient to revert to this practice. Performance would continue to be monitored on a constant basis via consultation with Portfolio Holders.

The Portfolio Holder for Economic Development noted that Grant Thornton had predicted that Broadland was in the top five percent of local authority areas that were expected to bounce back strongly from the pandemic. She congratulated staff on the speed with which business grants had been allocated and the level of business support that the Council had provided. In particular she congratulated Senior Economic Development Officer: Inward Investment and the Internal Consultancy Senior Lead and their Teams for the exceptional work they had done, as well as the Business Support Team. She noted that a Business Support report would be brought to Cabinet shortly that would include business start-ups and that a Skills and Training report that was also being drafted would also help address unemployment in the District.

The Portfolio Holder for Housing and Wellbeing commended the work of the Housing Team, who were doing a very good job under difficult circumstances. He noted that Disabled Facilities Grants had been carried over and that some new money had become available that was to be used to support people with Long Covid. He also noted that the affordable housing target had been exceeded, which was very positive.

The Portfolio Holder for Planning noted that the number of new homes delivered and planning decisions made within statutory were also on target for the District.

The Portfolio Holder for Environmental Excellence drew members' attention to the Environmental Projects Reserve, which she was sure would result in some excellent projects. The Waste Recycling figures were good, although the final figures would not be available until later, due to the way recycling was reported to Government. Fly tipping figures were also good at 3.3 per 100,000 and compared very favourably to the East of England which was 9.8 and 17.3 nationally.

The Leader noted that the report was well structured and that measures such as staff sickness and customer satisfaction were being baselined and would be reported soon. He suggested that whilst the fly tipping target was good it should be a more aspirational target.

The Chairman of the Overview and Scrutiny Committee confirmed that the Committee had been impressed by the reported performance over such a difficult time period. Members had also commended the establishment of the Environmental Projects Reserve. The Committee had proposed two amendments to the recommendations; the first was to include long term sickness in measure 4 – staff absence levels, which might give an insight to any areas of concern. The second was to maintain the current reporting schedule for performance measures, however, the clarification that it could cause confusion when considering the year end out turn was a satisfactory explanation for making the change.

The Leader thanked the Chairman of the Overview and Scrutiny Committee and confirmed that long-term sickness would be looked at as part of the overall staff absence measure.

Following a show of hands it was unanimously

RESOLVED:

1. To agree the revenue and capital position for Quarter 4; and
2. To agree the 2020/21 performance measure update for Quarter 4; and
3. To agree to change the reporting schedule for performance measures, with the next updates coming to Cabinet in Quarters 2 and Quarters 4 2021/22.

RECOMMENDED TO COUNCIL

1. To agree the slippage requests for both revenue and capital; and
2. To agree the creation of the following new earmarked reserve:
 - Environmental Projects Reserve.

Reasons for decision

The report was a factual account.

9 EMPTY HOMES POLICY

The Assistant Director Individuals and Families introduced the report, which presented a revised Empty Homes Policy.

The Policy was being refreshed to bring it up to date with Government guidance and to ensure that empty homes were brought back into use as soon as possible. The Policy would continue to offer interest free loan to owners of empty homes in order to renovate them and bring them back into use and additional Council Tax charges of up to 300 percent would also remain in place to incentivise owners to do so as well. As a last resort the Council could proceed with a Compulsory Purchase Order (CPO) or an Empty Dwelling Management Order (EDMO). The former would be used to buy and sell the property, the latter would be rented out by the Council.

As either procedure was a very serious step, a clear set of principles were set out in the Policy to ensure that this action was only undertaken as a last resort. These included a Community Impact Assessment and a points based assessment to determine if enforcement was appropriate, as well as a financial assessment of the viability of such action. All of these proposed actions would be brought to Cabinet for final determination.

The Assistant Director Individuals and Families confirmed that officers were now proposing that the reserve fund in recommendation 3 should be for £600,000, not £500,000 as set out in the report. This would cover the purchase cost of two homes for the average price in the District of £290,964.

The revised Policy would allow for a clear audit trail, whilst protecting the public purse and demonstrate that the Council had a proactive approach to bringing empty homes back into use.

The Portfolio Holder for Housing and Wellbeing advise the meeting that he fully endorsed the Policy, which was a good balance of support and enforcement. He would like, however, to amend recommendation 3 to the following:

3. To approve creation within the 2021/22 financial year of:
 - A reserve fund of £650,000 in order to undertake a voluntary offer of purchase as part of a Compulsory Purchase Order procedure *and to enforce housing standards*.

The proposed amendment was supported by members.

In response to a query about members no longer receiving empty homes lists for their Wards, the Portfolio Holder for Housing and Wellbeing pointed out

that at paragraph 2.4 the Policy stated that empty homes data would be provided for members as part of quarterly performance reporting.

Voting was carried out by way of a roll call and it was unanimously

RESOLVED:

1. To approve adoption of the Empty Homes Policy and that this be reviewed by the Overview and Scrutiny Committee after one year;
2. to agree proposal that Cabinet provides approval to seek to undertake Empty Dwelling Management Order (EDMO) and Compulsory Purchase Order (CPOs) processes on a case by case basis;
3. To approve creation within the 2021/22 financial year of:
 - A reserve fund of £650,000 in order to undertake a voluntary offer of purchase as part of a Compulsory Purchase Order procedure and to enforce housing standards.

Reasons for decision

To allow the Council to take a robust approach to tackling housing issues and support residents.

10 HOUSES IN MULTIPLE OCCUPATION DISCRETIONARY ACTIVITY POLICY

The Assistant Director for Individuals and Families introduced the report, which presented the Houses in Multiple Occupation Discretionary Activity Policy for adoption. The Policy would enable the Council to take a robust approach to tackling housing issues, support wellbeing and reduce abuse and exploitation of vulnerable residents.

The report also proposed amending an existing vacancy from Band E to Band F to enable the recruitment of a full time Community Enforcement Officer post, as well as a temporary 0.5 fte Community Enforcement Officer post funded through the Covid-19 Outbreak Management Fund. These posts would allow for a more proactive approach to be taken by the Council to housing standards.

The Portfolio Holder for Housing and Wellbeing welcomed the report, which he considered sent a clear message to landlords that the Council would not accept sub-standard accommodation for its residents. He also proposed amending recommendation 8.2 to the following:

2. To approve amending an existing vacancy from Band E to Band F enabling recruitment to 1fte Community Enforcement Officer post, *with the costs split on a 45/55 basis between Broadland and South Norfolk;*

He also proposed the following additional recommendation 8.3

3. *That a 0.5 fte Community Enforcement Officer post will be in place for two years and will be funded through the Covid-19 Outbreak Management Fund.*

The Portfolio Holder for Finance advised members that she did have some concerns about the Policy as a landlord could reduce the number of tenants to below the licensable threshold, which could in turn put pressure on the Council to provide temporary accommodation. She added that this risk should have been included in the report.

The Portfolio Holder for Economic Development welcomed the clarity provided by the amendment to recommendation 8.2, but voiced similar concerns to the Portfolio Holder for Finance regarding risks. She suggested that a lot of landlords were unaware of these regulations and that officers should place an emphasis on education before enforcement.

In response the Assistant Director for Individuals and Families confirmed that it was the intention to assist businesses to be the best they could be and that a well-run House in Multiple Occupation could be an asset for the District.

The Housing Standards Senior Manager advised the meeting that the Council would give a landlord a considerable amount of time to put their property in good order and would only take enforcement action if the property was in a dangerous condition. He added that it was unlikely that a landlord would reduce the number of tenants below the threshold and lose rental income because of the relatively minor cost of being registered.

The Leader noted that the Council had a statutory obligation to enforce decent housing standards and that it should engage and support landlords to comply with these standards.

Voting was carried out by way of a roll call and by 4 votes to 3 it was

RESOLVED:

1. To approve adoption of the Houses in Multiple Occupation Discretionary Activity Policy; and
2. To approve amending an existing vacancy from Band E to Band F enabling recruitment to 1fte Community Enforcement Officer post, with

the costs split on a 45/55 basis between Broadland and South Norfolk;
and

3. That a 0.5 fte Community Enforcement Officer post will be in place for two years and will be funded through the Covid-19 Outbreak Management Fund.

Reasons for decision

To take a proactive approach to identifying and monitoring Houses in Multiple Occupation across the District.

The meeting closed at 19.27pm

DRAFT

OVERVIEW AND SCRUTINY COMMITTEE

Minutes of a meeting of the Overview and Scrutiny Committee of Broadland District Council, held at Thorpe Lodge, 1 Yarmouth Road, Thorpe St Andrew, Norwich on 15 June 2021 at 10.00 am when there were present:

Committee Members Present: Councillor: S Riley (Chairman), M L Murrell (Vice-Chairman), N J Brennan, P E Bulman, S J Catchpole, S I Holland, C Karimi-Ghovanlou, D King, G K Nurden and S M Prutton.

Officers in Attendance: The Director of Place, Chief of Staff and Monitoring Officer, Assistant Director of Individuals and Families, Help Hub and Communities Senior Manager, Communities Manager, Senior Governance Officer (SW), and Democratic Services Officers (LA, JO)

Also In Attendance Amanda Murr and Liam Bannon from the Norfolk County Community Safety Partnership

9 APOLOGIES FOR ABSENCE

Apologies for absence were received from Cllr K Kelly and Cllr N Shaw.

10 MINUTES

The minutes of the meeting held on 8 June 2021 were agreed as a correct record.

11 MATTERS ARISING

The Chairman noted reference in the minutes to the Environmental Strategy, which was raised under minute 6 - Strategic Performance and Finance Report Quarter 4, and that a presentation from the newly appointed

Environmental Coordinator was to be raised as a future item for the Work Programme.

12 COMMUNITY SAFETY UPDATE

Amanda Murr advised the meeting that she was the manager of the Norfolk County Community Safety Partnership (NCCSP). The NCCSP was unique in that the Police and Crime Commissioner (PCC) had a memorandum of understanding with Norfolk County Council that the NCCSP would lie within the PCC, which allowed for the coordination of the Norfolk Community Safety Plan and the Police and Crime Plan.

Norfolk's Community Safety Plan was in the process of being refreshed and was currently out for consultation to allow Norfolk residents to give their views on community safety priorities, approaches, and long-term outcomes. The consultation would run until 16 July 2021.

The NCCSP's strategic assessment of crime and community safety issues affecting Norfolk informed the seven proposed priorities for the next three years. These were:

- Serious violence
- Domestic and sexual abuse
- Preventing terrorism
- Criminal exploitation, including modern slavery and county lines
- Neighbourhood crimes like robbery, burglary, anti-social behaviour, vehicle crime, and other theft offences
- Hate crime and community tensions
- Fraud, which amounted to £16m a year in Norfolk

The proposed approach to responding to these priorities used the evidence-led Public Health Model. This meant the NCCSP would develop an understanding of the proposed priorities using available data and information. It would then develop interventions that would be effective in achieving its long-term outcomes.

The NCCSP wanted to make the public and professionals aware of a variety of community safety issues in order to enable them to better protect themselves and others. Once the priorities had been agreed, the partnership would use a variety of approaches to promote important community safety messages to both the people of Norfolk and professionals.

The NCCSP had proposed setting 12 long-term outcomes, which it would work to achieve over the course of the next three years. These were spread across the following four strategic areas:

Building resilient, cohesive communities

- So people felt safe from crime and anti-social behaviour in Norfolk
- Reducing overall levels of hate crime, fraud and anti-social behaviour
- So victims felt confident reporting their experience and were able to cope and recover.

Tackling and reducing neighbourhood crime

- So victims of neighbourhood crime were supported to cope and recover from their experience
- To reduce overall neighbourhood crime levels
- To reduce reoffending.

Reducing the threat of criminal exploitation

- So people were prevented from being drawn into criminal exploitation and terrorism
- So victims of exploitation were made to feel safe
- People most at risk of criminal exploitation in Norfolk were identified and supported as early as possible.
- Safeguarding communities from abuse and serious violence
- So victims were more confident reporting their experience and were satisfied with the response
- So victims of abuse and violence were supported to cope and recover
- To reduce overall victimisation, risk, harm, perpetration and reoffending for rape and sexual offences, domestic abuse and serious violence.

The Community Safety Partnership brought together organisations from across Norfolk to tackle crime and disorder, and thematic priority delivery groups would be responsible for responding to these priorities, including domestic abuse, modern slavery, serious violence and community cohesion.

A member noted that when crime statistics were presented to parish councils and Safer Neighbourhood Action Panels they were often not up-to-date or comprehensive enough.

In response, the Committee was informed that this would be taken on board and that the NCCSP had an ambition to include measures to ensure that relevant and timely information was made available as one of its outcomes in the Plan. The Committee was advised that the NCCSP website was also due for a refresh, but the partnership did not wish to be digitally exclusive and wanted the public to know about its work through a wide range of media.

In answer to a query about extremism, the Committee was informed that this could happen anywhere, even in the most rural of areas, and that members, with a good local knowledge of their wards, were a vital source of intelligence for the detection of potential terrorist activity.

The Committee were asked to support the approach and priorities set out in the Community Safety Plan.

The Assistant Director for Individuals and Families advised the meeting that a formal response from the Council to the consultation was to be drafted. The Chairman thanked Amanda Murr and Liam Bannon for their comprehensive presentation.

13 PROVISION OF LEISURE PRINCIPLES

The Communities Manager and the Help Hub and Communities Senior Manager gave a presentation on Community Wellbeing, which encompassed the means of supporting individuals and communities to be:

- Independent
- Self-sufficient
- Physically and mentally active
- Creative
- Healthy
- Prosperous
- Supportive
- Able to access local, regional, national and global funding, knowledge and expertise

Community Wellbeing supported the Council's priorities of:

- Growing the economy
- Supporting individuals and empowering communities
- Protecting and improving the natural and built environment, whilst maximising the quality of life
- Moving with the times, working smartly and collaboratively

All these priorities were covered, but a particular emphasis was placed on supporting individuals. The economy was also stimulated through investment, job creation and up skilling the workforce. Protecting and improving the natural and built environment was carried out through Assets of Community Value and moving with the times was demonstrated by digital content and the lottery.

This work was all part of a bigger picture, which saw Broadly Active patients referred to the Help Hub and Community Connectors for support and advice and preventing problems at an early stage.

Three key elements of this were

- To act as a broker to ensure that communities were aware of what is out there and how to access it.
- To deliver when services were not privately viable, but necessary

- To enable communities to develop their own services or provide wider services at a local level and use time, skills and resource to let the community grow themselves

The Council undertook a wide range of projects and activities as part of the Community Wellbeing agenda including: Broadly Active, Tots2Teens, Member Ward Grants and the Community at Heart Lottery.

Many activities had no core expenditure and those that did represented very good value for money such as Tot2Teens. Moreover, Broadland was the only such provider that worked on a one to one basis with children with special needs and a discounted service was also provided for people on benefits.

Other elements of the wellbeing agenda included Member Ward Grants, which funded 33 projects in 2020/21. It was intended to gather more data on these projects in future to provide evidence of the number of people benefiting from these projects.

The Community at Heart Lottery had proven to be a success, with core annual expenditure of £1,042 absorbed in the income from the lottery and an estimate of £48,500 generated for good causes by the end of the year. So far 53 good causes had signed up for lottery funds.

Sports Grants of £150 were awarded to promising individuals, whilst selected applicants chosen as Sporting Champions had received £1000.

Wellbeing groups had been established across the District, and it was emphasised that it was usually officer time, rather than money, that was required to start up these groups.

There were over 13,500 residents registered with parkrun in the District which had no ongoing costs after the £4,000 one off cost to get the schemes started.

Projects such as the Community at Heart Lottery or parkrun cost very little in terms of time, resource and finance, but supported a huge number of people. Members were advised that as a resident's individual needs increased, so did the cost of intervention, for example Broadly Active was relatively expensive per person and required a lot of staff time, but each individual had much greater level of need that would present more expensive challenges to other elements of the public purse compared to the costs of the scheme.

The Chairman requested that officers bring a report back to the Committee prior to the final Cabinet report that would set out any areas of variance in policy or pressures in the delivery of service that the Team were experiencing together with any proposals from officers as to how these could tackled.

The Assistant Director for Individuals and Families confirmed that a report would be brought back to the Committee.

The Committee adjourned at 11.25am and reconvened at 11.35am, when all the Committee members listed above were present.

14 MAINTENANCE OF BRIDGES IN BROADLAND

The Director of Place introduced the report, which had been drafted following concerns raised by the Committee about the level of reserves that had been set aside to meet the Council's future liabilities for bridge maintenance.

The Committee was advised that the Council owned five bridges along the Marriott's Way and 19 bridges along the Bure Valley Railway (BVR). The bridge maintenance contract had historically been managed by Norfolk County Council's Bridge Team, but due to a high workload and limited resources there had been no recent programme of inspections or maintenance work carried out.

In order to address this issue the Council had appointed a specialist company to carry out an inspection programme for all the Council's bridges. The findings of the inspections were split into Low, Medium or High priorities along with their associated total costs. These were

- Low priority works: £170,800
- Medium priority works: £160,700
- High priority works: £6,500
- Total: £338,000

The budget for bridges had been separated by Cabinet in 2020 into two budgets, which totalled £270,000 for the BVR and £60,000 for Marriott's Way.

The works identified as a result of the inspections would now be translated into a programme of works that could be carried out within budget over the next 2-3 years, utilising the existing capital funds, as set out above.

In answer to a query about forming a trust with other public bodies to pay for the maintenance, it was confirmed that there was no short term pressure to form a trust at this stage, although it might be a consideration for the future.

Members were also advised that no major defects had been identified, but any future major repairs which would exceed the relevant budget, would be referred back to Members for approval. Discussions would also take place with the BVR over any major works.

In respect of the European Interreg project, led by the County Council, it was confirmed that this funding was for tourism and could not be used for ongoing maintenance.

In response to a query from the Chairman about the Adam and Eve Bridge at Little Hautbois, the Director of Place confirmed that emergency repairs had been commissioned and carried out. He would update members on these works after the meeting.

The Committee were advised that bridge repairs could be very costly. An example of this was Hoveton Footbridge, which had repair costs of £124,000.

The Chairman commended the level of detail included in the report, which had allowed the Committee to thoroughly scrutinise the budgetary measures that the Council had in place to fund the maintenance of the bridges that it was responsible for.

The Committee was informed that a new Community Assets Manager would shortly be in post and that a review was being conducted of all of the Council's assets.

AGREED

To note the report and the works required to maintain the Council's bridges on the Bure Valley Railway and Marriott's Way and to endorse the intention to draft a programme to carry out the identified maintenance works within the allocated budgets.

15 OVERVIEW AND SCRUTINY COMMITTEE WORK PROGRAMME

The Senior Governance Officer drew members' attention to the Work Programme. The Community Safety and Bridge Maintenance items had been satisfactorily concluded. The Leisure Principles item would be brought back to the Committee with a further report in August.

There were two items scheduled for the 24 August 2021 meeting, these were; Guidance for Town and Parish Councils in Respect of Public Open Space, as requested by Sprowston Town Council and Engagement in Public Consultations, which had been put forward by Cllr Shaw. The latter item was quite timely, as a new Customer Experience and Insight Lead had been recruited who would be able to advise the Committee on a preferred approach. Currently each Council department devise its own way to conduct consultations.

The 11 November 2021 meeting would review the Housing Allocations Policy following its implementation in April 2021. A review of the Member Grants Scheme would also be held at that meeting.

A date was still to be arranged for the Apprenticeships and New Schemes item, as a report to support a recommendation to the Secretary of State was still awaited.

A review of the Empty Homes Policy would be scheduled for June 2022.

The Time and Task Panel looking at Staff Turnover would be meeting in July. There were no updates from Cllr Copplestone regarding Broadband or water supply and management, although an all member briefing on Better Broadband for Norfolk was to be arranged for summer 2021.

The Council partnerships Register Review was on hold due to the pandemic.

The Committee confirmed that they would like the newly appointed Environmental Coordinator to come to a meeting to explain to members what projects she was proposing to undertake with the £750,000 Environmental Projects Reserve.

In response to a query about Committee the start times of meetings, the Chief of Staff and Monitoring Officer that this would be scoped out with all members, but initially it would be considered through the Member Development Panel.

Discussion turned to the lack of any papers for today's presentations. It was confirmed that officers would seek to provide links or a brief summary for presentations in the future.

(The meeting concluded at 12.16pm)

Chairman

CAPITAL BUDGET

Report Author: Rodney Fincham
Assistant Director Finance
01508 533 982
rodney.fincham@broadland.gov.uk

Portfolio: Finance, Environmental Excellence

Wards Affected: All

Purpose of the Report:

To increase the Capital Budget for Refuse Services to £5.7m.

Recommendation:

To recommend to Council that the 20/21 Capital Budget for Refuse Services is increased from £3m to £5.7m.

1. Current Capital Budget

- 1.1 Cabinet on 9 February 2021 / Full Council on 25 February 21 agreed a 20/21 capital budget for Refuse Services of £3m as follows:

A budget of £3m has been included in the Programme to allow for the potential purchase of refuse vehicles and/or the refurbishment of the existing waste depot at Frettenham. Expenditure against this budget would be subject to a full business case and the Council may need to borrow to fund any additional costs, should they be identified.

2. Update on Capital Need

- 2.1 In February, it was uncertain whether the Council would need to purchase the refuse vehicles and / or update the Frettenham Depot. This was because the Council, as part of the retender of its Strategic Environment contract, wanted to see whether it would be more cost effective:
- to use an alternative depot, and / or

- for the contractor to purchase the refuse vehicles.
- 2.2 The Authority will not know the final depot solution until the final waste tenders have been evaluated (August 21). Thus, no update to the Capital Programme is needed for any depot works at present. However, if the successful bidder does wish to utilise the current depot there will need to be investment in it.
- 2.3 However, it has become clear during the initial stages of the procurement process that local authority funding of the refuse vehicles is the most cost effective solution. And although the Council will not know the actual capital cost of the vehicles until the final waste tenders have been evaluated (August 21) it is clear that more than £3m will be required.
- 2.4 The precise number of vehicles that will be required to deliver the contract will not be finalised until the bidders submit their final tenders, but at the Invitation to Submit Initial Tender Stage (ISIT) the capital costs for providing the vehicles ranged from £4.8 - £5.7m.
- 2.5 The actual cost is likely to be lower than this, as the cost depends on the solution the winning bidder proposes, however it is prudent to provide this full sum.

3. Options

- 3.1 The Council could defer the decision to increase the Capital Budget until its next meeting on 30 September, when the winning bidder (and thus the actual capital cost) would be known.
- 3.2 However, this would potentially defer the award decision until the 30 September (+ 10 days formal standstill period). Although this is only a few weeks after the proposed award date, these few extra weeks would reduce the potential mobilisation period (if a new contractor is successful) and reduce the time available to order new vehicles and have them delivered prior to the start of the new contract on 1 April 22.

4. Issues and risks

4.1 Resource Implications

Purchasing new refuse vehicles is one of the largest capital expenditure items that the Council incurs.

£5.7m is at the top end of the likely cost range and the actual cost will be determined by the outcome of the refuse tender process.

The additional capital requirement can be funded from reserves; however, a full review of the funding strategy will be carried out as part of the 22/23 budget setting process.

4.2 Legal Implications

The Refuse Contract is being let using a Competitive Process with Negotiation (CPN). It would not be appropriate to share details of any of the financial bids at this time.

4.3 Equality Implications - None

4.4 Environmental Impact

All vehicles used on the new contract will need to be Euro VI compliant or better. There is also the potential that bidders will seek to use alternative fuels and / or introduce a small number of electric vehicles from mobilisation.

4.5 Crime and Disorder – N/A

4.6 Risks

Delaying the contract award would reduce the mobilisation time for any new waste arrangements.

Failure to provide appropriate resource to purchase refuse vehicles, could jeopardise the refuse service.

5. Recommendations

- 5.1 To recommend to Council that the 20/21 Capital Budget for Refuse Services is increased from £3m to £5.7m.

Background papers

None

INSURANCE CONTRACT – REQUEST FOR DELEGATION TO AWARD

Report Author: Rodney Fincham
Assistant Director Finance
01508 533 982
rodney.fincham@broadland.gov.uk

Portfolio: Finance

Wards Affected: All

Purpose of the Report:

To agree a Cabinet delegation to be able to award a new insurance contract.

Recommendation:

To delegate authority to the Assistant Director of Finance, in consultation with the BDC Portfolio Holder for Finance and the SNC Portfolio Holder for Finance and Resources to award a new insurance contract.

1. Summary

- 1.1 BDC and SNC are currently in the process of tendering for a new joint insurance contract. The compressed timeline means that current Cabinet dates do not correspond with the date that we require sign off of the chosen contractor(s). We therefore wish to request a Cabinet delegation for officers to award this contract.

2. Background

- 2.1 Both BDC and SNC were working with the LGA to help develop an insurance mutual offering. However it has not proved possible to progress with this at this time.

2.2 Both Councils therefore need to progress with a compressed re-procurement of insurance cover. Both the current BDC and SNC insurance contracts end on 30 September 21.

2.3 The Council has the following main insurance covers:

- Property
- Terrorism
- Employers Liability
- Public Liability
- Officials Indemnity
- Professional Indemnity
- Crime
- Personal Accident
- Computer
- Engineering Inspection and Business Interruption
- Motor Fleet

And the cost of insurance is c£100,000 a year for BDC and c£400,000 for SNC.

2.4 The Contract Procedure Rules require Cabinet approval for the award of tenders / quotations above £100,001.

3. Timetable

3.1 The following table sets out the current timetable.

Stage	Date
Tender documents issued	24 May 21
Deadline for receipt of submissions	5 July
Evaluation of tender submissions	6 July - 2 August
Earliest possible award decision	Early August
Latest possible date to notify successful and unsuccessful bidders of tender outcome	3 September
10 day legal standstill period ends	13 September
Contract commencement date	1 October 21

3.2 The key dates to note are that:

- The tender evaluation will not be completed until at the earliest early August (and if there is any slippage this may not be until mid / late August) and
- We need to provisionally award by early September.

3.3 This means that we are unable to report the outcome to either the August cycle of meetings (BDC O&S 3 Aug, SNC Cabinet 9 Aug, BDC Cabinet 10 Aug) or the September cycle (BDC O&S 7 Sep SNC 13 Sep, BDC 14 Sep).

4. Award Criteria

4.1 The following table sets out the Award Criteria

Price	Total Cost	50%
	Financial Certainty	5%
Quality	Cover	30%
	Service Delivery	5%
	Claims Handling	5%
	Additional Value	5%
		100%

5. Options

5.1 There are 2 options as follows:

- Hold a special Cabinet meeting during the mid-August – early September period.
- Delegate the award decision.

5.2 It is not feasible to delay the award as we need insurance cover to be in place from 30 September.

6. Issues and risks

6.1 **Resource Implications** – It is necessary to ensure insurance cover is maintained.

6.2 **Legal Implications** – Given the value of the insurance cover it is necessary to comply with a full and open procurement process.

6.3 **Equality Implications** – None

6.4 **Environmental Impact** – N/A

6.5 **Crime and Disorder** – N/A

6.6 **Risks** – The procurement timetable is tight as we have had to adopt a compressed timeline. To mitigate this risk we are following good project management processes.

7. Recommendations

7.1 To delegate authority to the Assistant Director of Finance, in consultation with the BDC Portfolio Holder for Finance and the SNC Portfolio Holder for Finance and Resources to award a new insurance contract.

Background papers

None

BROADLAND USE OF THE NORFOLK STRATEGIC FUND GRANT

Report Author: Tig Armstrong
Assistant Director – Economic Growth
07790 563 554
tig.armstrong@broadland.gov.uk

Portfolio: Economic Development

Wards Affected: All

Purpose of the Report:

This report seek Cabinet's endorsement of the revised programme of activity supported by the Norfolk Strategic Fund grant, and to request authority be delegated to the Assistant Director for Economic Growth, in consultation with the Portfolio Holder for Economic Growth to determine the use of the balance of the grant monies in support of the economic recovery.

Recommendations:

1. Cabinet endorses the proposed revised programme of activity to be funded from the Norfolk Strategic Fund grant.
2. Cabinet agrees to delegate authority to the Assistant Director of Economic Growth, in consultation with the Portfolio Holder for Economic Development to determine the use of the balance of the grant monies (~ £99,000) in support of the economic recovery.

1. Summary

- 1.1 The purpose of this report is to seek Cabinet's endorsement of a revised programme of work funded by the Norfolk Strategic Fund grant.
- 1.2 In October 2020 BDC was awarded £428,573 from the Norfolk Strategic Fund based on a proposed programme of works (detailed in Table One, para. 2.2).
- 1.3 The proposed programme of works was discussed with informally with Cabinet in late 2020, where it was provisionally agreed to allocate most of the funding to an entrepreneurship development programme known as Enterprise Facilitation®, plus an associated programme of business start-up grants. These two elements formed the basis of BDC's original Norfolk Strategic Fund submission.
- 1.4 However, following a presentation from the Sirolli Institute about Enterprise Facilitation®, and further internal discussions, it was decided by Members not to proceed with the Enterprise Facilitation® programme.
- 1.5 The proposed new programme of work (detailed in Table Two, para. 4.1) remains consistent with the broad aims of the Norfolk Strategic Fund grant, i.e. supporting the local economy to recover from the impacts of the pandemic. It is also consistent to BDC's emerging programme of business support activities.
- 1.6 Subject to Cabinet's endorsement of the revised programme, a variation request will be sent to the administrators of the Norfolk Strategic Fund programme (i.e. the County Council).
- 1.7 Funds are due to be expended by December 2022.

2. Background

- 2.1 In October 2020 Broadland District Council was awarded £428,573 from Norfolk Strategic Fund (NSF). The NSF was a one-off grant programme, funded primarily from Norfolk's pooled business rates, that was to be used to support economic recovery activities. The funds were split equally between the seven district councils, with a larger amount awarded to the LEP/NCC, by agreement of the Norfolk Leaders group.
- 2.2 Table One shows the programme and budget as submitted by BDC and approved by Norfolk County Council in their capacity as the programme managers.

Table One – original/approved Norfolk Strategic Fund grant

Item	Amount £	Capital / Revenue
Commissioning of enterprise facilitation services following Sirolli Institute Principles for 2 years and Trinity of Management online workshop	£85,000	Revenue

1x FTE Enterprise Facilitator including on-costs and expenses for 2-year post	£130,000	Revenue
Marketing, comms and publicity for enterprise start up grants (2 years)	£10,000	Revenue
BDC contribution to support of the Cambridge-Norwich Tech corridor	£15,000	Revenue
Enterprise start up grants	£286,344.23	Mixed
<i>Sub-total</i>	<i>£526,344.23</i>	
Less BDC match funding	(£97,817.23)	
Total Norfolk Strategic Fund grant	£428, 527	

- 2.3 However, following a presentation to BDC members and officers from the Sirolli Institute, the developers and deliverers of the Enterprise Facilitation®, and representatives of Blaenau Gwent County Borough Council (Wales) who have been delivering Enterprise Facilitation® for a number of years, it was decided by members not to proceed with Enterprise Facilitation® as it was not seen to represent good value for money. Furthermore, it was not seen to add significantly to what can currently be delivered locally by the Council and other organisations.

3. Current position/findings

- 3.1 Officers are currently planning a refreshed programme of post-Covid business support activities. Presentations setting out the 'general direction of travel' have been given to members at both Councils (specifically Economic Success Panel and the Environment & Economy Policy Committee (SNC)) and have been well received (presentation attached at Appendix One).
- 3.2 The revised programme of activity (Table Two) is consistent with the proposed suite of business support activities.
- 3.3 It is also proposed to set aside £135,000 to fund a range of minor public realm improvements in key high streets. This work is proposed for two reasons; i) it is important to ensure high streets and the public realm remain attractive and accessible destinations for residents and visitors alike, to retain and increase footfall, and ii) the pandemic has accelerated emerging shopping trends and minor changes assist in responding to these trends (e.g. temporarily increasing the number of temporary short stay parking bays)

4. Proposed action

- 4.1 Subject to Cabinet's endorsement of the proposed programme (below) a grant variation request will be sent to Norfolk County Council.

Table Two – revised programme funded by the Norfolk Strategic Fund grant

Item	Proposed budget	Comments
Start-up/SME business mentor	£60,000	Temporary appt. (18 months)
Operating costs	£20,000	Room hire, materials etc related to the above position
SME / start-up grants	£100,000	Small grants programme
Public realm improvements	£135,000	Minor capital works to enhance the public realm in key market towns
BDC to CNTC project	£15,000	Previously committed sum to support the Cambridge Norwich Tech Corridor
<i>Sub-total</i>	<i>£330,000</i>	
Contingency	£98,527	To be allocated to related additional activities.
Total Norfolk Strategic Fund grant	£428,527	

4.2 The match funding of £97,817.23 shown in Table One has been removed from Table Two as this amount does not form part of the grant award and is not required to be reported on.

4.3 The activities described in the table above will be delivered by the Economic Growth team by December 2022.

5. Other options

5.1 A range of alternative activities could be funded via this grant. However, it is the view of officers that the proposed programme represents the best of use of these funds.

6. Issues and risks

6.1 **Resource Implications** – Staff time will be required to administer the proposed grants programme and public realm improvements. This will be managed within the existing staff establishment.

6.2 **Legal Implications** – N/A

6.3 **Equality Implications** – N/A

6.4 **Environmental Impact** – N/A

6.5 **Crime and Disorder** – N/A

6.6 **Risks** – the primary risk is that the funds will not be spent in accordance with the approved programme and/or not be defrayed by December 2022. This risk will be mitigated by careful project management by the Economic Growth team

7. Conclusion

7.1 The proposed revised programme of activity has been designed to meet the needs of existing businesses and those looking to start a new business, as well as funding minor capital works that respond to changing consumer demands in a number of high streets.

8. Recommendations

8.1 Cabinet endorses the proposed revised programme of activity to be funded from the Norfolk Strategic Fund grant.

8.2 Cabinet agrees to delegate authority to the Assistant Director of Economic Growth, in consultation with the Portfolio Holder for Economic Development to determine the use of the balance of the grant monies (~ £99,000) in support of the economic recovery.

Background papers

Business Support presentation – as presented to the Economic Success Panel

MOVING TOWARDS A FIRST-CLASS CUSTOMER SERVICE

Report Author: Shaun Crook Transformation & Innovation Lead
01508 535307 shaun.crook@broadland.gov.uk

Portfolio: Transformation and Organisational Development

Wards Affected: All

Purpose of the Report:

This report provides Cabinet with an overview of current progress and findings of the Customer Satisfaction and Customer Complaints projects.

The report sets out a proposal for our Customer Strategy and Customer Charter, recommendations in relation to the creation of a Customer Experience & Insight lead role, and a new Complaints Handling Policy incorporating an Unreasonably Persistent Complainants Policy, to allow us to transform our future customer provision.

Recommendations:

We ask that Cabinet consider and approve:

1. The adoption of the proposed Customer Strategy;
2. The adoption of the proposed Customer Charter; and
3. To note the appointment of a new Customer Experience & Insight Lead role.

We ask that Cabinet approve and **recommend to Council:**

1. The adoption of the proposed Complaints Handling Policy
2. The adoption of the proposed Unreasonably Persistent Complainants Policy

1. Summary

- 1.1 **Customer Satisfaction** is a Corporate Project within the SPARK Transformation Programme. Research was conducted late 2020 to document the current approach to customer satisfaction and to investigate the approach of other organisations both in the private and public sectors. Workshops were held with staff across the council to identify areas of strength and areas for improvement in our current customer service provision and to gather their ideas on how we could transform the way we serve our customers in the future. This work resulted in a series of recommendation papers which were discussed and subsequently approved by the Corporate Management Team.
- 1.2 **Complaints** is a project within the SPARK Transformation - New Ways of Working Corporate Programme. Research was undertaken in 2020/21 to understand current complaint handling practices and processes and to research how other organisations manage complaints. This included a series of meetings with staff who regularly deal with complaints and with several Assistant Directors. In addition, we considered guidance published by the Ombudsman. This work resulted in a recommendation paper which proposed a new Complaints Policy and Unreasonable Complainants Policy both of which were considered and subsequently approved by the Corporate Management Team.

2 Background

Customer Satisfaction

- 2.1 Research was conducted late 2020 to document the current approach to customer satisfaction and to consider the approach of other organisations both in the private and public sectors.
- 2.2 Workshops were held with staff from all areas of the organisation to identify areas of strength and weakness in our current customer service provision. We also gathered their ideas about how we could transform the way we serve our customers in the future.
- 2.3 Best practices and agreed ambitions were identified and used to formulate a proposed Customer Strategy, a Customer Charter, and to develop an approach for gathering consistent and measurable customer feedback, initially in the form of a corporate Customer Satisfaction Survey.
- 2.4 The existing Customer Service team provision was reviewed to ensure that it was suitable to deliver the proposed Customer Strategy.
- 2.5 The Councils 2021/22 Delivery Plan includes a Customer Satisfaction measure for which it has not yet possible to produce any data for. This work helps move us to a position where we can firstly baseline a Customer Satisfaction measure and then start to report our performance against that measure.

Complaints

- 2.6 Investigation was undertaken in 2020/21 to understand current complaint handling practices and processes and to research how other organisations manage complaints including considering published guidance from the Ombudsman.
- 2.7 A series of meetings were held with staff who deal with complaints to identify strengths and areas for improvement with the current approach.
- 2.8 Best practices and future ambitions for handling complaints and dealing with unreasonably persistent complainants were identified and two new policies, with supporting processes and procedures were developed.

3 Current position

Customer Satisfaction - Findings from the review

- 3.1 Across the council there is already lots of really good work to engage with our customers, however this tends to be in at service level or for specific reasons. During the COVID-19 pandemic 'response' and 'recovery' phases through engaging with customers, more often and in different ways we have started to learn how customer behaviour and customer expectations are changing as a result of the new ways of working we adopted during the pandemic.
- 3.2 We deliver some great customer service performance across the council but there are also times when we don't quite meet the levels we would like. When this happens, we don't have an overarching corporate Customer Strategy with an agreed 'Vision' for the type of Customer Service we aspire to deliver.
- 3.3 In most cases we deliver a great service and our customers support us to do our jobs effectively, however on occasion things don't go as well as we would like. When this happens, neither our customers nor our staff have a published Customer Charter to refer to. A Customer Charter sets out what customers should expect from us and what we expect from them. Generally, organisations of this size have this type of document to underpin their customer service standards.
- 3.4 Without a Customer Strategy and Charter officers do not have a clear framework to work to in relation to customer service standards nor a reference point to challenge customers' behaviour if inappropriate.
- 3.5 We gather customer feedback and insight in different ways across the organisation, but we don't currently have a consistent way to gather and analyse this data at a corporate level to inform and shape decision making. We regularly engage with our customers but there is no corporate or standard mechanism for customers to give us their feedback on a regular and ongoing basis. This means we are unable to measure our performance in this regard or consistently gather customer insight to shape service improvement and transformation.

- 3.6 The councils have Delivery Plan performance measures for Customer Satisfaction, but without a corporate or standard mechanism to measure this it has not been possible to produce any data to date.
- 3.7 During our review we identified a number of customer related tasks which help us to engage with, analyse and understand customer experience and behaviour. When these tasks were gathered at a corporate level, this identified a gap in the current Customer Service structure.
- 3.8 Individually, services work hard to meet customer demand but currently there isn't a dedicated business lead responsible for transforming our customer provision to meet changing customer needs and behaviours and ensure we maximise opportunities afforded by our new flexible, remote working contracts to further enhance our service provision.
- 3.9 There is a real desire and passion across the organisation to really engage with our customers to help shape our service transformation and customer service provision.

Complaints - Findings from the review

- 3.10 The council has an established complaints handling process in place, which ensures that we deal with complaints in line with statutory guidance however the council currently has no published complaints handling policy or unreasonably persistent complainants' policy.
- 3.11 Complaints are currently handled initially at an informal stage and then escalated to a formal stage if requested by the customer.
- 3.12 Complaints at the informal stage are not recorded and therefore can remain at that stage for some time without being effectively managed to ensure they are dealt with in a timely manner. This can mean that complaints that may be ongoing for a long time at the informal stage are not visible to senior leaders.
- 3.13 Because complaints at the informal stage are not recorded, they cannot be collated, analysed or used to help shape service improvement for our customers. This can lead to the causes of dissatisfaction remaining unresolved and potentially to repeat complaints.
- 3.14 Whilst many complaints are handled effectively, without a clear policy and supporting processes and procedures they are handled differently across directorates which means that the standard of responses can vary delivering inconsistent outcomes for customers.
- 3.15 There is currently no organisational oversight for complaints and analysis and reporting of formal complaints is limited. Around 40% of the Councils we case studied have an independent officer that gives an impartial overview of complaints at formal Review Stage (Stage 2).
- 3.16 Currently it is possible for the staff member who dealt with a complaint at the informal stage to deal with the complaint at the formal stage. It is considered good

practice to have the complaint reviewed by a different member of staff to provide an independent assessment.

- 3.17 Around 90% of the Councils we case studied have a two-stage formal process with an Investigation Stage and a Review Stage. This is also identified as good practice by the Ombudsman.
- 3.18 Although individual services implement changes following an upheld complaint there is no structured 'lessons learned' approach across the organisation to ensure that we change processes to reduce errors and avoid repeating the cause for complaints.

4 Proposed action

- 4.1 By putting our customers at the heart of what we do, across the organisation, we can reap the benefits of improved customer satisfaction, delivering efficiencies through service improvements and reducing waste by identifying and resolving causes of dissatisfaction and complaint. We believe that the best way to embed this way of working across the organisation is by clearly setting out our ambitions through a Customer Strategy and supporting Vision and by being open with our customers about what they can expect from us and what we expect from them through a Customer Charter.
- 4.2 As we emerge from the pandemic it is vital that we understand and react to changing customer behaviours and expectations as we shape and transform our services as we continue to develop our One Team, Two Councils model. To do this effectively we need to have the right resources and mechanisms in place to gather, collate and analyse Customer feedback and insight and ensure that our decisions are informed by data.
- 4.3 We are therefore proposing the following recommendations;

Customer Satisfaction

- 4.4 **Implement a new Customer Satisfaction Strategy and Customer Charter** (as set out in Appendix 1)
- 4.5 A new Customer Satisfaction Strategy and Customer Charter brings a range of benefits that we have set out below;
 - 4.5.1 Customer satisfaction is not only about measurables such as how long something takes or how many times something happens. It is also about an emotional reaction. Really engaging with our customers on a personal level will allow us to know how our customers feel about our services.
 - 4.5.2 By engaging with our customers more widely it means that customers can help shape our services and we deliver outcomes that are to their benefit, whilst making our processes more efficient and cost effective.

- 4.5.3 Understanding more about our customer demographics will enable us to target our communications more proactively to inform and reduce unnecessary contact.
- 4.5.4 The Customer Charter provides a key point of reference, a reason to challenge what we do, and a performance standard to aspire to. It should be used and embraced alongside our current organisational values. It will underpin customer-focused activities and support actions to deliver culture change across the organisation.
- 4.5.5 It helps us move to a position where we can establish a baseline measure for Customer Satisfaction and then start to report our performance against that measure.
- 4.6 **Introduce a dedicated Customer Engagement & Insight Lead role on a 2-year Fixed Term Appointment** (with the option to extend to a permanent role by agreement) (as per Appendix 2, part A)
- 4.7 The funding for the new role is contained within the Covid Funding Paper which will be going to Cabinets in June.
- 4.8 Appointing a dedicated Customer Engagement & Insight Lead will bring a range of benefits that are set out below;
 - 4.8.1 Currently there is a range of customer engagement related work which is either done on an ad-hoc basis and therefore incurs a hidden cost to the organisation or not currently resourced. By moving responsibility for this work into a single role, it will release capacity elsewhere and reduce duplication of effort.
 - 4.8.2 The new lead will have overall responsibility for analytical and research work of customer data to provide holistic oversight and help deliver the strategic ambitions of our councils and to support our transformation agenda.
 - 4.8.3 Funding this role from the Covid budget recognises that role will be crucial to understanding changes in customer behaviours and expectations post the COVID-19 pandemic. This role will also be key to ensuring that we then use this to transform our customer service provision by maximising opportunities presented by flexible and remote working from any location.
- 4.9 **To move line management for the core Customer Service Team** (as per Appendix 2, part B)
- 4.10 We propose to move line management from Place directorate to the new Customer Engagement & Insight Lead under the AD Transformation, IT and Digital within the Resources directorate. There are a number of benefits that we have identified, and these are set out below.
 - 4.10.1 It recognises the corporate nature of the team and provides an improved escalation route for feedback and ideas to improve the customer service

provision.

4.10.2 It places the team within the structure of the AD for Transformation, IT & Digital alongside key enabling teams.

4.10.3 It will enable the team to support how we embed the Customer Service Strategy across the organisation and enriches job satisfaction.

Complaints

4.11 **Implement the proposed complaints handling policy** (as set out in Appendix 3).

4.12 There are a range of benefits that we have identified which will be realised by implementing the new Complaints policy which we have set out below;

4.12.1 The proposed complaints handling policy offers a two-stage formal process, an Investigation Stage and a Review Stage which still provides a clear focus on resolving the complaint at the earliest opportunity but also ensures we capture learning points at both stages to improve services and reduce causes of dissatisfaction and complaint.

4.12.2 It ensures that complaints and expressions of dissatisfaction are progressed without unnecessary delay, that early contact is made with the customer to discuss their issue and that the complainant then receives updates and a timely response at each stage.

4.12.3 It ensures that a complaint is reviewed by a different person at the Review Stage from the person who carried out the Investigation Stage to ensure the complainant receives an objective review.

4.12.4 Ensures that ownership for handling and managing complaints will remain within the appropriate service area but with an independent review of our Stage 1 responses to ensure that our responses are reviewed from a customer perspective in line with our customer charter and provides objectivity.

4.12.5 It introduces a quality assurance review across all complaints at the Review Stage to ensure that we have done everything we should to resolve the complaint before it escalates to the Ombudsman.

4.12.6 It will reduce the number of cases that need to be dealt with directly by the Managing Director but leaves a path for this to happen in the more contentious cases.

4.12.7 Aligns the complaints processes for both Councils which enables officers to work in the most efficient way.

4.13 **Implement a new Unreasonably Persistent Complainants' policy** (as set out in Appendix 4).

4.14 There are benefits that we have identified which will be realised by implementing the new Unreasonably Persistent Complainants' policy which we have set out below.

4.14.1 The unreasonably persistent complainant's policy provides staff with a framework on how to deal with complainants that may be behaving in what the Council deem as an unreasonable manner.

4.14.2 It provides a clear process for decision making in these cases

4.14.3 Aligns the unreasonably persistent complainant's processes for both Councils which enables officers to work in the most efficient way.

5. Other options

5.1 The Council could decide to maintain the current/existing arrangements and ways of working with regards to customer experience and complaints, however, this would mean that the benefits set out above would not be achieved.

6. Issues and risks

6.1 **Resource Implications** – If the decision to extend the new Customer Engagement & Insight Lead beyond the initial 2-year contract is made then ongoing funding for this role would need to be identified.

6.2 **Legal Implications** – None identified

6.3 **Equality Implications** – None identified

6.4 **Environmental Impact** – No impact identified

6.5 **Crime and Disorder** – No impact identified

6.6 **Risks** – None identified

7. Conclusion

7.1 This report sets out proposals that will form key steps to moving towards delivering a first-class customer service and enabling us to shape and transform our customer service provision to enable customers to achieve the right outcome, at the right time and in the right way.

8. Recommendations

8.1 We ask that Cabinet consider and approve:

8.1.1 The adoption of the proposed Customer Strategy;

- 8.1.2 The adoption of the proposed Customer Charter; and
- 8.1.3 To note the appointment of a new Customer Experience & Insight Lead role.
- 8.2 We ask that Cabinet approve and recommend to Council:
 - 8.2.1 The adoption of the proposed Complaints Handling Policy
 - 8.2.2 The adoption of the proposed Unreasonably Persistent Complainants Policy

Background papers

None

Moving towards a First Class Customer Service

Appendix 1 - Customer Strategy including Customer Charter

2021

Version 1.0

Our Customer Strategy

By putting our customers at the heart of what we do, across the organisation, we can reap the benefits. As One Team supporting Two Councils, now is the perfect time to renew our focus on this.

Customer satisfaction is not only about measurables – how long something takes or how many times something happens - it is an emotional reaction. Really *engaging* with our customers on a personal level will allow us to;



Background

We are here to serve our customers and to enable them to be able to access services in the right way and at the right time. We want to ensure that we involve and support them as effectively as possible.

We have some good examples of great customer experience but we always strive to do better.

We will be improving our service by;

Introducing a customer charter which sets out what customers can expect from us and what we need from them

Introducing a consistent mechanism for our customers to engage with us and provide feedback and help shape our services

Introducing and publishing customer service performance data to show how we are doing.

This document sets out our approach in more detail.

Our vision

To have a Customer Service culture that builds a strong relationship between us and our residents, businesses and partners across Broadland and South Norfolk.

To allow open and free flowing feedback, in a way that is appropriate to the customer, giving us the ability to recognise areas of success and use feedback to continuously improve our services.

To ensure that services are designed around our customer needs and that they can access services through multiple channels and at times that they need us.

How will we deliver it?

By introducing a new approach across the organisation and delivering it through the following key areas:

New Customer
engagement
mechanisms

Using
Customer
feedback
effectively

Enhancing our
Communications

Delivering
Improvement
by innovation

Embedding
a new
customer
service
culture

Ensuring
we have
the right
resource

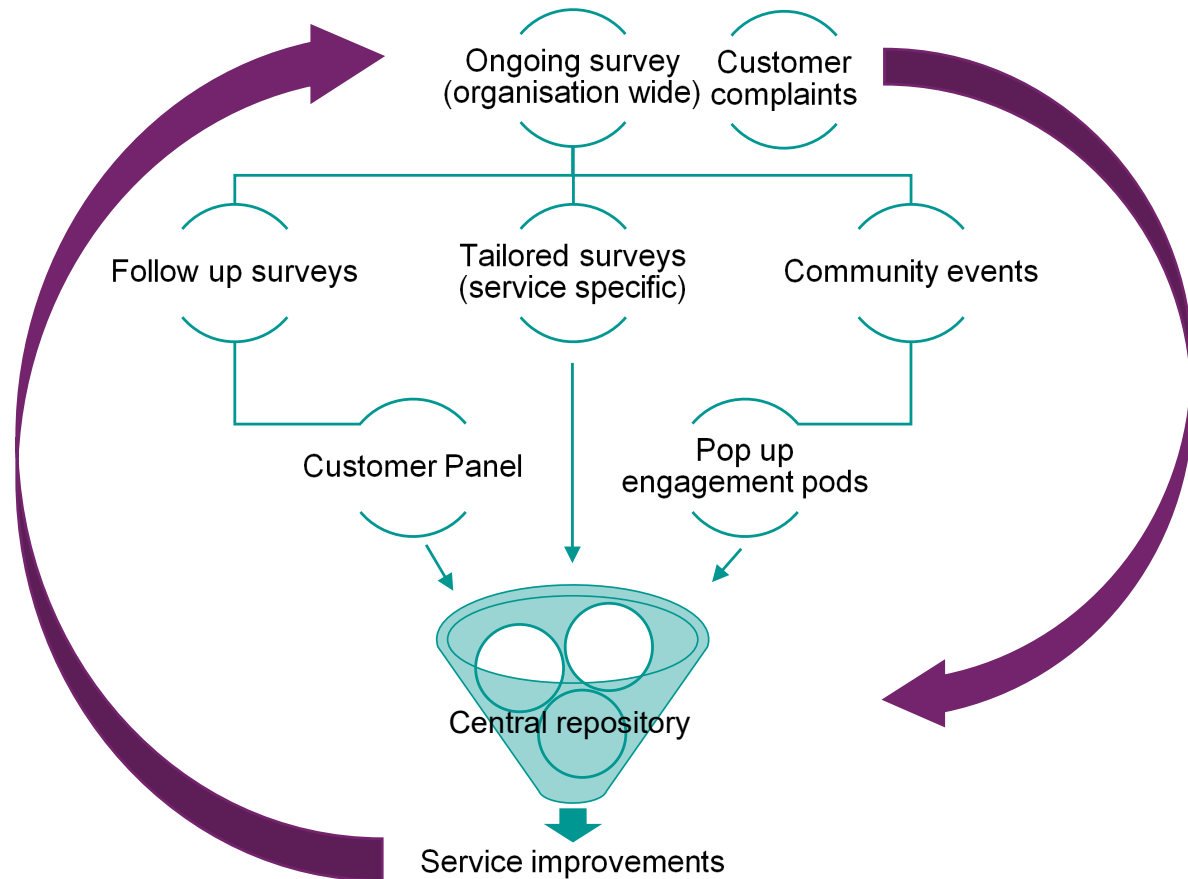
Improved
complaints
handling

Customer Feedback mechanisms

All feedback should be seen as good feedback, and should be used to inspire service improvements that will benefit our customers.

We will look to expand our opportunities to engage with our customers, as displayed by the graphic, right.

Service specific, tailored and transactional surveys will also be used to improve customer experience.



Our new Customer Charter

We will make it clear how you can contact us and access our services

- Explain what services we provide and what to expect from them
- Offer different contact options to suit your needs and preferences
- Empower you to tell us how we are doing and help us to improve our organisation
- Make sure you can contact us in the way and at a time that works for you

We will treat you with respect, courtesy and understanding

- Communicate with you in plain English with no jargon
- Identify ourselves and give you our names
- Respect your right to privacy and confidentiality
- Make sure our team have the skills, behaviours and tools they require to deliver services to you

We will listen, understand, and get things done

- Keep you informed with up to date information about the services you use
- Do our best to put things right that have gone wrong
- Try and resolve your query the first time you contact us. If we can't, we will let you know the next steps.

You can help us achieve this by

- Always treating our staff and contractors with respect and courtesy
- Giving us all the information we require to help us meet your needs
- Giving us feedback on our service so we can learn and improve
- Telling us when something changes
- Asking us to explain anything you are not sure about



Who is our customer?
Any individual, group, organisation or business that resides in, does business in or with, or visits, the Broadland or South Norfolk district

We will...



Website

- Aim to have the website available 24 hours a day all year round
- Continue to improve the services available online
- Ensure our website and online processes are clear, quick and easy to use



Telephone

- Keep waiting times to a minimum. In times of high demand, we will keep you informed.
- Update automated messages regularly with up to date information
- When returning your calls, staff will clearly state their first name, their department and their reason for calling



Face to face

- Make sure our buildings are welcoming, safe and fully accessible
- Where possible provide you with bookable appointments
- If there is a delay or change to your appointment we will explain why and keep you informed.



Social media

- Share relevant and timely information
- Be clear and concise
- Respond to questions as quickly as possible



Written communication

- Ensure all service email addresses have an 'automatic reply' which clearly explains what will happen next
- Make sure all emails contain our contact details
- Make sure any letters we send contain a reference so they are easy to trace if necessary



Innovation

- Use new technology, as it becomes available, to create more ways for you to get in touch with us
- Make more of our services available online and look for ways to increase our flexibility so you can contact us at a time that suits you
- Keep up to date with emerging technology that we could use to help you to get the right outcome, at the right time and in the right way

Moving towards a First Class Customer Service

Appendix 2

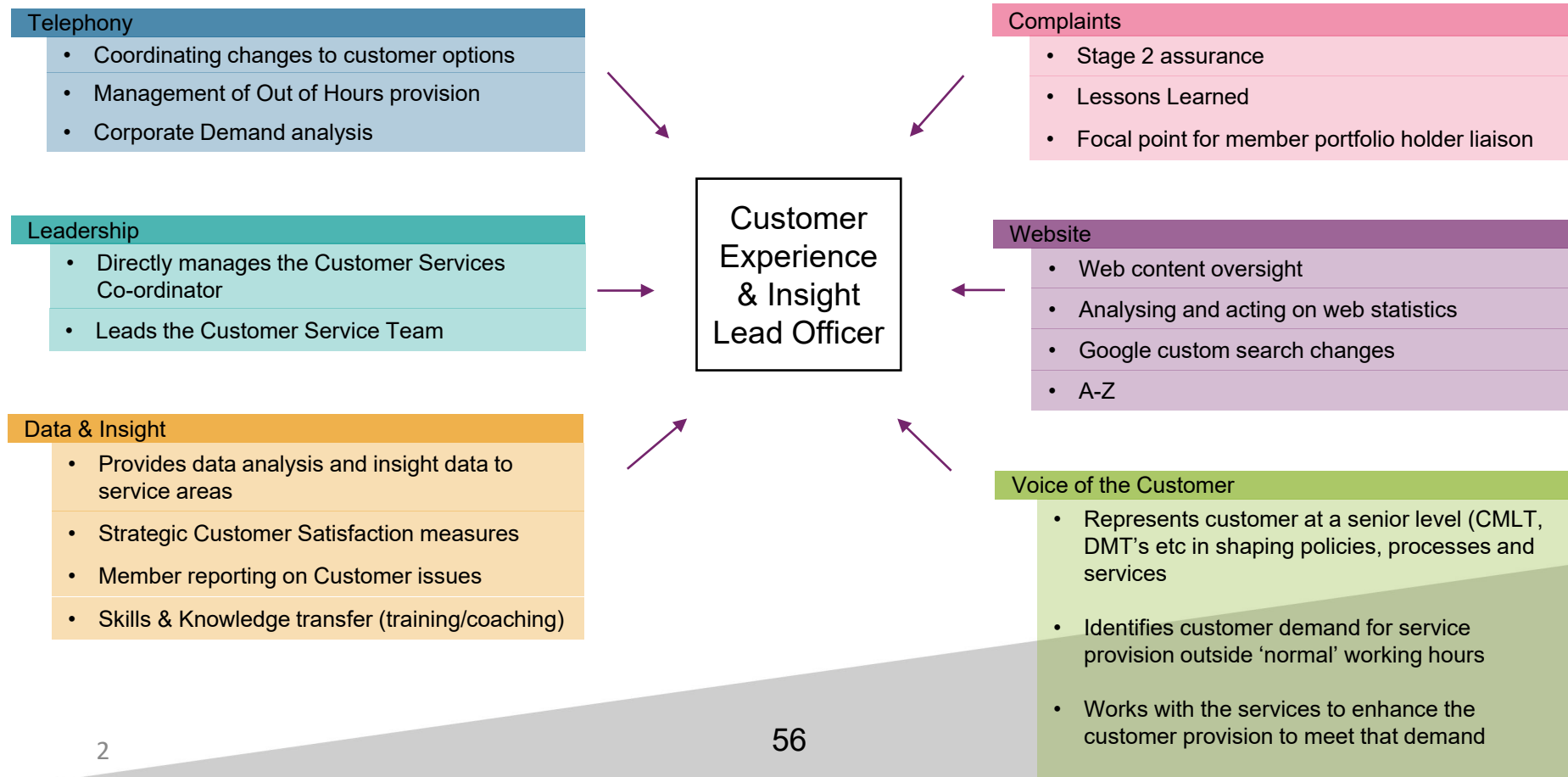
- A) Customer Experience & Insight Lead Role
- B) Customer Service Structure

2021

Version 1.0

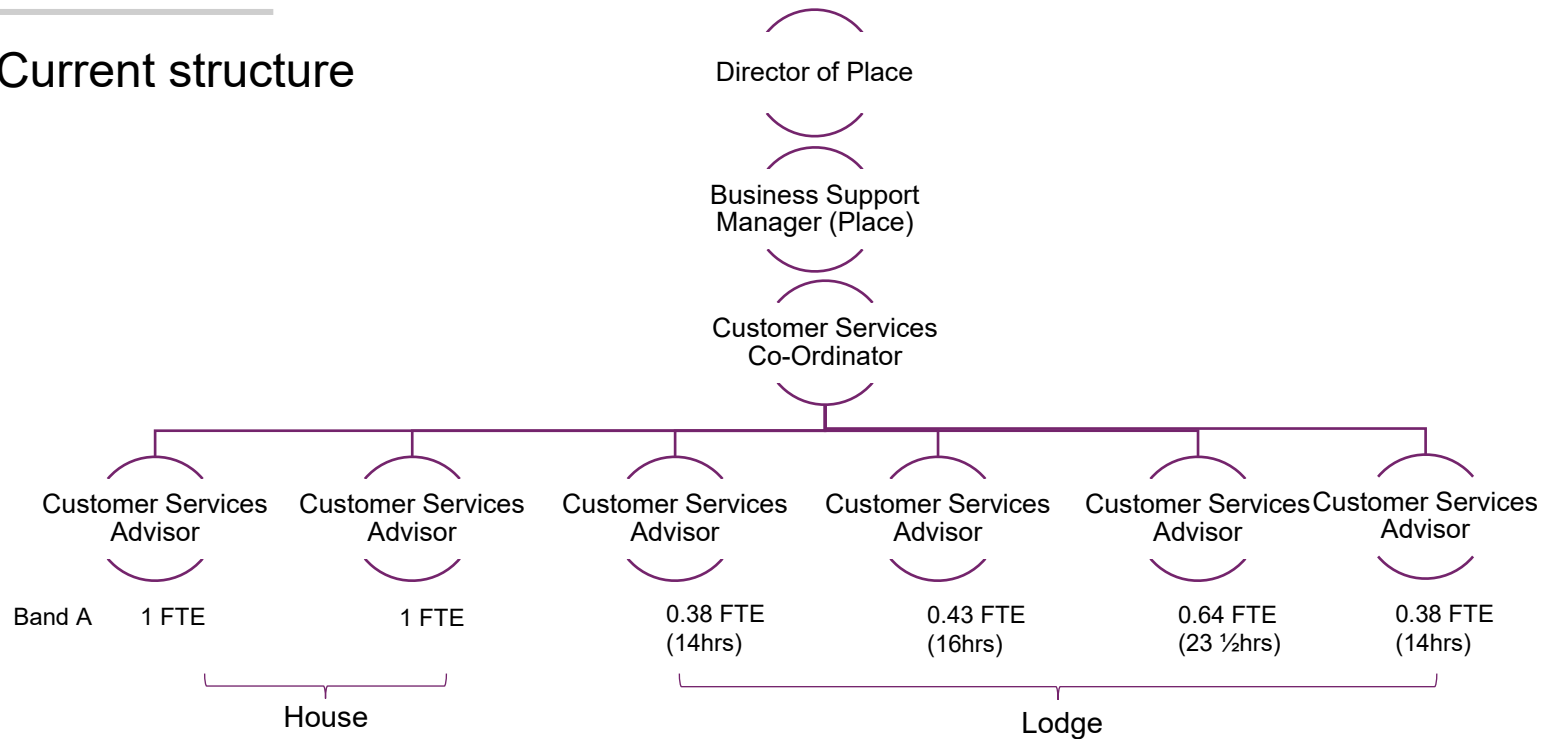
A) The Customer Experience & Insight Lead Role

We are recommending a new role which would effectively fill a gap in our existing structure and bring together all on the customer related responsibilities into a single, central point to ensure a cohesive and strategic approach to delivering the Customer Strategy and ensuring that we embed the behaviours set out in the Customer Charter.



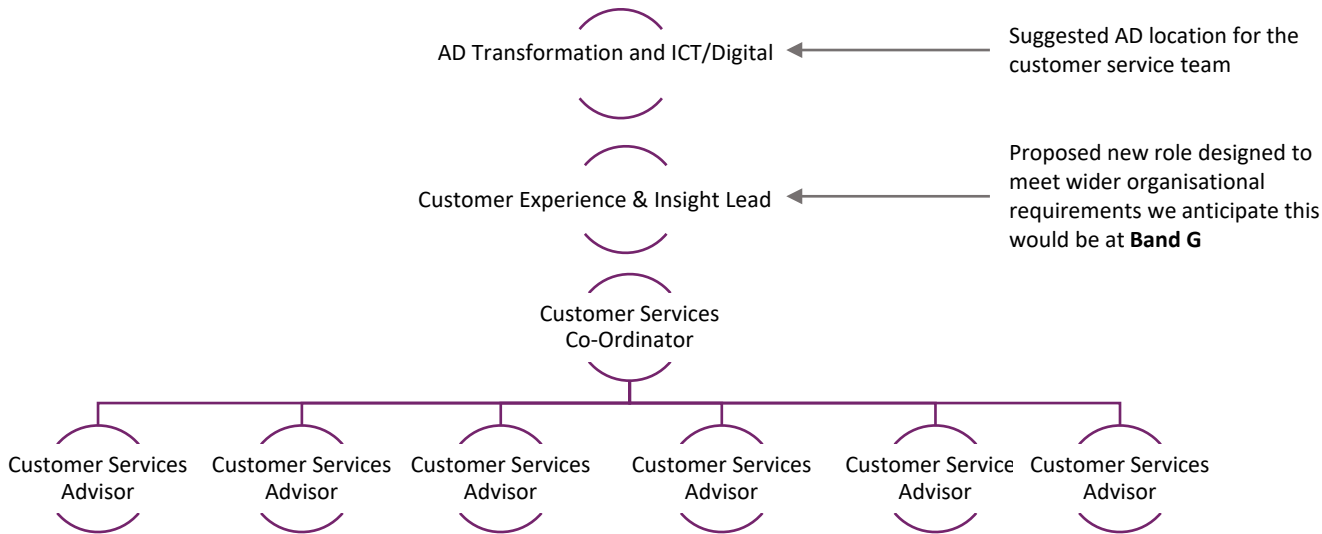
B) The Customer Service Structure

Current structure



Proposed structure

In order to deliver against our Customer Satisfaction Strategy, our Customer Service provision needs be appropriately placed and suitably resourced within the structure of the organisation.



We propose the current provision is moved from Place directorate into the Resources directorate, under the new AD for Transformation and ICT/Digital for the following reasons:

- It moves responsibility for the team to a new Customer Experience & Insight Lead role which has overall responsibility for overall customer experience.
- It brings the Customer Service provision in the same directorate as Comms, Transformation and Innovation, ICT/Digital and Facilities. This places them in the best place to help shape our new Customer Strategy approach and influence how we engage with our customers including social media and digital services as well as our face-to-face offering.

Two Councils - One Team

Broadland District Council Complaints Policy Appendix 3

Introduction

This complaint policy sits alongside our overall customer satisfaction strategy and should be considered alongside our customer charter.

At Broadland District Council we are committed to continually improving our services and ensure that we put our communities and residents at the heart of everything we do.

In order to do this, we encourage, our residents, businesses, visitors, community groups and any other group or individual that uses or are affected by our services (referred in this policy as complainants) to tell us when things go wrong. This is important because then we can put things right and learn from our mistakes.

This policy sets out how we handle complaints from our complainants in a simple and timely way that is open and transparent.

Our definition of a complaint is:

“An expression of dissatisfaction about a council service (whether that service is provided directly by the council or by a contractor or partner) that requires a response.”

The following steps are applied to all complaints received and we will:

- 1 •Receive your complaint
- 2 •Listen to you and understand your complaint
- 3 •Agree with you what we are going to do
- 4 •Do what we said we were going to do
- 5 •Inform you about what we have done, when we have done it
- 6 •Learn from what has happened to prevent it being repeated

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Good complaint handling means:

Being customer focussed

We will ensure our complaints process is easy to find and use and keep our complainants informed.

Being open and accountable

We will have a process that is transparent and admit when things have gone wrong.

Acting fairly and proportionately

We will base our decisions on sound evidence and explain clearly why they were made

Putting things right

When we have done something wrong we will apologise and take steps to put it right

Seeking continuous improvement

We will learn from complaints received and use this to improve our services

Getting it right

We will comply with the law and follow our own policies.

Stages of Complaint

Our aim is to resolve complaints for our complainants as quickly and simply as possible. Our principle is to provide a high-quality response which resolves the issues raised by the complainant and finds a suitable outcome.

Stage 1

- This is the investigation stage.
- Responsibility sits with the manager responsible for the service.
- The purpose is to fully investigate the complaint and the emphasis is on trying to reach a resolution. If a resolution cannot be reached, the complainant has the right to escalate their complaint to Stage 2.

Stage 2

- This is the review stage.
- Responsibility sits with the Director of the relevant service area
- To carry out a review of the response we provided to the complaint at Stage 1 to and to review any new relevant information provided by the complainant.

When we receive a Stage 1 and 2 complaint, we will:

- Acknowledge the complaint.
- Contact the complainant to discuss the complaint and agree what we are going to do.
- Investigate the complaint and do what we say we will do to resolve the complaint.

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- Keep the complainant informed and notify them if there is a delay and commit to a new timescale in which they will receive a response.
- Contact the complainant to tell them what we have done and why we have done it (the outcome and reasons for the decision).

For Stage 2 complaints we will also:

- Establish why the complainant is dissatisfied with the response at Stage 1.
- Try to deal with the cause of the dissatisfaction before it escalates to Stage 2.
- If there are no grounds to investigate at Stage 2, contact the complainant to explain our decision.
- If there are grounds for a review at Stage 2 then follow the above procedures for all complaints

In our responses where applicable:

We will:

- Acknowledge when things go wrong
- Apologise when appropriate
- Improve procedures so similar problems do not happen again

Response Times

We aim to resolve all complaints within 15 working days. However, if a complaint can be resolved sooner, then we will make every effort to do so. Some more complex cases may take longer but we will ensure you are kept informed.

Next Steps

If you have been through all stages of our complaints procedure and are still dissatisfied, you can ask the Local Government Ombudsman to review your complaint.

The Ombudsman investigates complaints in a fair and independent way - it does not take sides. It is a free service.

The Ombudsman expects you to have given us chance to deal with your complaint, before you contact them. If you have not heard from us within a reasonable time, it may decide to look into your complaint anyway, this is usually up to 12 weeks.

The Local Government Ombudsman looks at individual complaints about councils and some other organisations providing local public services.

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Contact

Website: www.lgo.org.uk

Telephone: 0300 061 0614

Opening hours

Monday to Friday: 10am to 4pm (except public holidays)

Continuous Improvement

We are committed to learning from the complaints we receive and promoting a culture of continuous improvement. To do this we will:

- Regularly report the complaints received to senior leaders along with lessons learned.
- Review and make changes to policies and procedures where necessary.
- Provide relevant training to staff.

Other types of feedback or enquiries

The following will not be dealt with under this policy but will be dealt with under their own policy/procedure:

- Complaints of fraud or corruption
- Whistleblowing
- Hate incidents
- Information requests
- Member misconduct

Retention Guidelines

The following sets out our retention guidelines for all complaints received:

Stage 1 & Stage 2 Complaints

- Destroy 2 years after the closure of the complaint. Unless the complaint has been escalated to the Ombudsmen (see Ombudsmen retention guidance).
- Files will be reviewed and destroyed on a monthly basis.

Ombudsmen Complaints

- Destroy 6 years after the closure of the complaint.
- Files will be reviewed and destroyed on a quarterly basis.

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Appendix 4

Policy: Unreasonably persistent contact or complaints/complainants

Introduction

1. The majority of complaints will be resolved through our complaints handling process and policy and all efforts should be made to do so. However, in a small number of cases people pursue complaints in a way that can impede the investigation of their complaint, or can have significant resource implications for the council. This policy has been formulated alongside our customer charter to deal with the small number of complaints which make it necessary for special arrangements to be taken.
2. Before implementing the provisions in this policy, officers must consider whether the council's procedures have been followed correctly, make sure full and reasonable responses have already been given and decide if the complainant is now unreasonable.
3. The council has a duty to provide a safe working environment and system of work for its officers. Regardless of this policy, abusive, offensive or threatening conduct may be referred to the police to take action as appropriate in addition to any action the council may decide to take.

Unreasonable complaints

4. We have formulated this policy in accordance with guidance from the Local Government Ombudsman (LGO) in relation to the definition of **unreasonable complaint behaviour and unreasonable persistent complaints**.
5. We define unreasonable complaints as contact for persons who, because of the frequency or nature of their contacts with the council, hinder our consideration of their or other people's complaints.
6. Examples include the way, or frequency, in which complainants raise their complaint with staff or how complainants respond to officers dealing with the complaint.
7. Features of an unreasonable complaint include the following examples (the list is not exhaustive, nor does one single feature on its own imply that the complaint will be considered as being unreasonable).

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The following are non-exhaustive descriptions of the behaviour of an unreasonable complainant who may:

- Have insufficient grounds for their complaint and be making the complaint only to inconvenience the council, or for reasons that he or she does not admit or make obvious
- Refuse to specify the grounds of a complaint despite offers of assistance from council staff
- Refuse to co-operate with the complaints investigation process while still wishing their complaint to be resolved
- Refuse to accept that issues are not within the remit of the complaints policy, despite having been provided with information to this effect.
- Refuse to accept that issues are not within the power of the council to investigate, change or influence (e.g. insisting that there must not be any written record of the complaint or that a certain officer shall or shall not deal with the matter).
- Make groundless complaints about staff dealing with complaints and seek to have them dismissed or displaced.
- Make an unreasonable number of contacts with the council in relation to a specific complaint or complaints
- Make persistent and unreasonable demands of staff and/or the complaints process after the unreasonableness has been explained (e.g. a complainant who insists on immediate responses to numerous, frequent and/or complex letters, telephone calls or emails or demands to be seen immediately when coming to the council offices)
- Raise new or secondary issues whilst a complaint is being addressed that were not part of the complaint at the start of the complaint process
- Change the substance or basis of the complaint without reasonable justification whilst the complaint is being addressed

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- Adopt an excessively scattergun approach, by pursuing a complaint with the council and at the same time with a member of parliament, other councils, members of the council, the council's independent auditor, the police, solicitors and the Local Government Ombudsman
- Refuse to accept the outcome of the complaint process after its conclusion; repeatedly arguing the point, complaining about the outcome and/or denying that an adequate response has been given
- Make the same complaint repeatedly, perhaps with minor differences, after the complaints procedure has concluded, and insist that the minor differences make it a new complaint to be dealt with.
- Combine some or all of these features

Classification

8. The proposal to classify a complainant as unreasonably persistent or as behaving unreasonably should be made by the Director of the service area to which the complaint is being made and this should then be ratified and decided by the Corporate Management Leadership Team (CMLT) see points 11 and 15 below.
9. A written record shall be kept of why the complainant is believed to be unreasonable, what information has been considered and the decision made by (CMLT). The council shall act in a proportionate, fair and objective way.
10. If more than one service area is being contacted by the complainant, or both councils (South Norfolk and Broadland) are also being contacted, perhaps with different complaints, a nominated officer will co-ordinate the response and may consider setting up a joint meeting to agree a cross service / cross councils approach.

Initial notification

11. When an unreasonable persistent complaint / complainant has been identified, a final offer to meet face to face should be made by the service lead (Senior Manager or above) to explain to the complainant that the council may consider applying this policy due to the unacceptable behaviours. These should be explained along with the content of this policy. After the meeting or if the meeting is declined a letter or email will be sent to the complainant - see point 15 and the template letter for persistent

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complainants 'Important information regarding future correspondence', which will explain the action the council is taking.

Options for dealing with an unreasonable complainant

12. The options which the council may consider include:

- Refusing to accept a complaint or to amend the terms of the complaint
- Requesting contact to be in a particular format (e.g. letters only)
- Requiring contact to take place with one named member of staff only
- Restricting telephone calls to specified times/ days / duration
- Requiring any personal contact to take place in the presence of an appropriate witness
- Letting the complainant know that the council will not reply or acknowledge any further contact with them on the specific topic of that complaint or at all

In deciding on an appropriate option, care will be taken:

- Not to interfere with a complainant's statutory rights e.g. to attend council meetings or view papers, when making such restrictions
- To make sure that the council takes appropriate action in response to a matter included in a complaint where necessary
- If we have a duty of care as we are their current landlord e.g. temporary accommodation

13. These options are not exhaustive and other factors individual to the case or service may be relevant in deciding an appropriate course of action. For example any arrangements for restricting a complainants contacts must take into account the complainants circumstances such as age, disability, literacy levels, race, vulnerability and additional needs.

14. If none of the options listed above offer the protection that staff are entitled to, other options may be available, such as taking out an injunction against a complainant or involving the police. These will be considered on a case by case basis, in consultation with legal services as necessary.

15. When a decision has been made as to the appropriate restrictions to be used, the MD (after it has been ratified at CMLT) will write (email) the complainant explaining the council's decision and the nature of restrictions being made. (Refer the template letter as mentioned in point 11).

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16. If a complainant considers that the council is acting improperly or unfairly when making restrictions, they have the option of complaining to the Local Government Ombudsman which will have been explained in response to stage two complaints.
17. Appropriate managers, Executive Assistants and staff e.g. those likely to be involved in implementing the restrictions should be notified of the decision.

Reviewing decisions

18. All restrictions will be subject to review, at least once every six months. Service areas may wish to review within a shorter time period to take account of changes of circumstances and/or behaviour.

SKILLS AND TRAINING PROJECT

Report Author: Lucy Kirkum
Economic Growth Administrator
01508508736
lkirkum@s-norfolk.gov.uk

Portfolio: Economic Development

Wards Affected: All

Purpose of the Report:

This paper is intended to achieve the following:

- Outline the background and context of the local economic situation – specifically policy changes and changes in the economic environment that impact upon skills and training
- Define the target cohorts for our skills and training offer
- Provide a summary of the Councils' current skills and training provision
- Taking the previous sections into account, outline a project plan that will enable us to have a positive impact for the identified cohorts

Recommendations:

1. To note the impacts on skills, training and the wider economy in South Norfolk and Broadland and to note the intended approach to tailor our support to specific cohorts of residents and start-up businesses.
2. To agree to the establishment of a centralised apprenticeship budget comprised of existing apprenticeship posts across all directorates, topped up through increasing the vacancy factor from 2% to 3.5% to generate an additional £245,000 from recurring underspend across both councils.

1. Summary

1.1. This paper is intended to achieve the following:

- Outline the background and context of the local economic situation – specifically policy changes and changes in the economic environment that impact upon skills and training
- Define the target cohorts for our skills and training offer
- Provide a summary of the Councils' current skills and training provision
- Taking the previous sections into account, outline a project plan that will enable us to have a positive impact for the identified cohorts

2. Background

2.1 National Economic Position

2.1.1 The Covid-19 pandemic has had a significant impact on the UK economy. Despite the economy adapting well to the lockdowns, there was still a decline in economic activity in early 2021 where GDP fell by 2.5% in January. In March 2021, GDP remained 6% lower than before the pandemic.¹

2.1.2 A number of predictive recovery models with slightly differing estimations are available. These broadly project GDP to recover to late 2019 levels between 2022-2025². The following quote from the Organisation for Economic Co-operation and Development (OECD) outlines the current situation:

*'In both scenarios, the recovery, after an initial, rapid resumption of activity, will take a long time to bring output back to pre-pandemic levels, and the crisis will leave long-lasting scars - a fall in living standards, high unemployment and weak investment. Job losses in the most affected sectors, such as tourism, hospitality and entertainment, will particularly hit low-skilled, young, and informal workers'*³

2.1.3 The scenario described by the OECD is borne out in the following data:

¹ [House of Commons- Coronavirus: Economic impact briefing paper June 2021](#)

² [FT - Bank of England Tempers Forecasts for UK Economic Rebound](#)

³ [OECD - Economic Outlook June 2020](#)

- According to data from the Office of National Statistics (ONS), redundancies reached a record high of 370,000 in the three months to October 2020⁴.
- Data from Adzuna on UK job adverts shows that graduate jobs have decreased at a time of year when they would usually increase significantly. In Autumn 2019, the average number of graduate job adverts on Adzuna each week was 113. Across the same period a year later, the average amount of graduate vacancies on the site each week was around 59⁵.
- As of 28th Jan 2021, there were only a quarter of jobs advertised in catering and hospitality compared to the same time the previous year. Vacancies in education have reduced by a third year-on-year⁶.
- According to HMRC, the overall workforce has shrunk slightly, although early retirement due to COVID-19 accounts for some of this reduction. The vast majority of this change can be attributed to job losses⁷.
- Polling by the Resolution Foundation suggests that 13% of renters have fallen behind on their rent during the COVID-19 pandemic⁸.

2.2 South Norfolk and Broadland's Economic Position

- 2.2.1 Data from NOMIS shows that there was roughly a doubling in the out-of-work benefit claimant rate between March and May 2020 in South Norfolk and Broadland. The rate has now stabilised at around 4% in both districts. However, the end of furlough on September 30th 2021 may cause this figure to increase as businesses have less capacity to retain workers.
- 2.2.2 The rate is similar for men and women. However, the claimant rate for under 25's is around twice that of the general population in both Broadland (7.9%) and South Norfolk (6.6%). The impact on young people reflects a national trend.
- 2.2.3 Figure 1 (overleaf) displays the claimant rate for over 16s (as a proportion of the economically active population) in Broadland and South Norfolk.

⁴ [ONS - March 2020 Coronavirus Round Up](#)

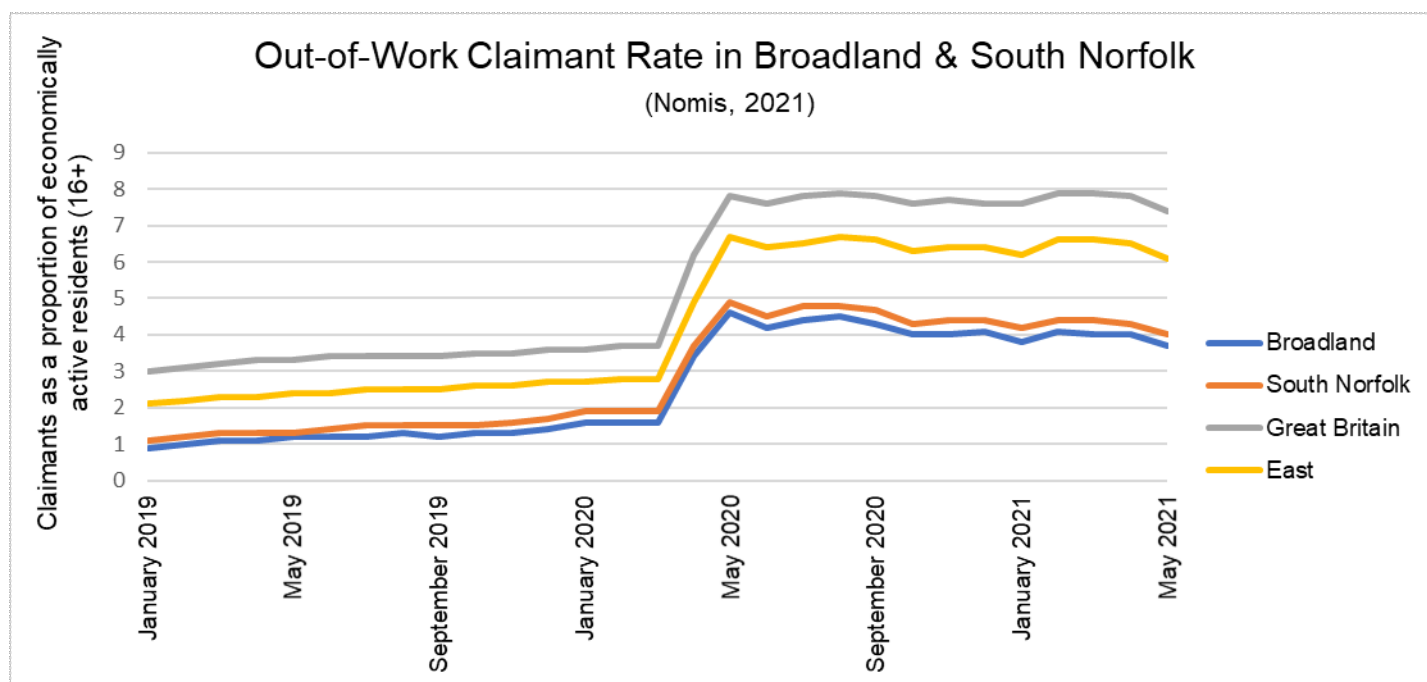
⁵ [ONS - Online Job Advert Estimates: June 21](#) NB: the average weekly graduate vacancy rate was compared across a nine-week period (w/c 05/09/19 – w/c 31/10/19 and w/c 04/09/20 – w/c 30/20/20).

⁶ [ONS - Coronavirus and the Latest Indicators for the UK Economy and Society: 28 January 2021](#)

⁷ [HMRC - PAYE Real Time Information](#)

⁸ [Resolution Foundation - Coping with Housing Costs Six Months On](#)

2.2.4 Figure 1 – *Local Out-of-Work Benefit Claimants*⁹



2.2.5 Research by the Centre for Progressive Policy predicted that South Norfolk and Broadland would be amongst the third of local authorities whose economies would fully recover in five years. Additionally, the Joseph Rowntree Foundation has published research suggesting that recovery in our areas will feature in the best 20% of the country.

2.2.6 Crucially, this may mean that future targeted support may not go towards our areas (especially in light of the 'levelling up' agenda). This presents a strong rationale for reviewing our current skills and training offer to ensure the Councils are providing a good level of support for those who need it most.

3. Current Position

3.1 The South Norfolk and Broadland Joint Inclusive Growth Strategy (2019)

3.1.1 The South Norfolk and Broadland Joint Inclusive Growth Strategy¹⁰ outlined a number of issues relating to skills and training in the local area. These included:

⁹ This graph displays ONS data taken from NOMIS, June 2021.

¹⁰ [Joint Inclusive Growth Strategy Project Plan](#)

- A shortage of public sector staff, such as social work and care workers
- A lack of defined career paths, leading to low aspiration, particularly amongst manual workers
- Insufficient numbers of graduate level opportunities in Norfolk
- Disadvantaged pupils in Norfolk are much less likely to access Higher Education (HE) study at undergraduate or postgraduate level than the UK average
- 13% of children in South Norfolk and Broadland are at risk of NEET (Not in Education, Employment or Training)
- A lack of skilled apprenticeships locally, with many being low paid
- Barriers to accessing adult education

3.1.2 According to the Institute of Fiscal Studies (IFS), the pandemic has not affected groups equally and is likely to have exacerbated existing inequalities¹¹, such as those listed in the previous section.

3.1.3 There has been increased economic disadvantage for young people¹², with the closure of schools likely to have deepened the socio-economic divide in educational attainment¹³. The effects of the pandemic have been felt particularly strongly by lower earners, with 80% of those in the bottom 10% of the earning distribution working in either a closed down sector or unlikely to have the option of working from home.

3.1.4 This section has outlined the concerning economic context in which we are reviewing our skills and training offer. In order to provide the most effective support to those who have been affected by the pandemic, it is necessary to identify specific cohorts in which to concentrate our efforts.

3.2 Defining Our Cohorts

3.2.1 In light of the significant contribution to skills, training and increasing human capital made by other organisations, we have focused on:

- Targeting specific cohorts of residents who will have been adversely affected by the economic consequences of the pandemic
- Identifying and targeting gaps in support to avoid duplicating provision, to ensure we help those who would not otherwise benefit from skills and training interventions

3.2.2 As such, using the contextual analysis at the start of the paper, combined with a knowledge of local factors affecting our residents, we identified seven initial

¹¹ [IFS - Inequalities in education, skills, and incomes in the UK, March 2021](#)

¹² [Health Foundation - Generation COVID-19](#)

¹³ IFS, March 2021

target groups. Following further refinement, these were narrowed down to four distinct cohorts:

- School leavers
- Higher education leavers
- Recently unemployed including underemployed
- Start ups (Individuals and entrepreneurs looking to start their own business)

3.2.3 Appendix 1 outlines our potential target cohorts and the rationale for their inclusion. Additional groups were considered for inclusion, however, these were excluded following further refinement. Existing support or a lack of specificity formed the rationale for not pursuing other cohorts.

3.2.4 To ensure the Councils' skills and training offer does not duplicate existing provision, an internal and external mapping exercise was undertaken to identify the support our chosen targets currently receive. This can be found in Appendix 2.

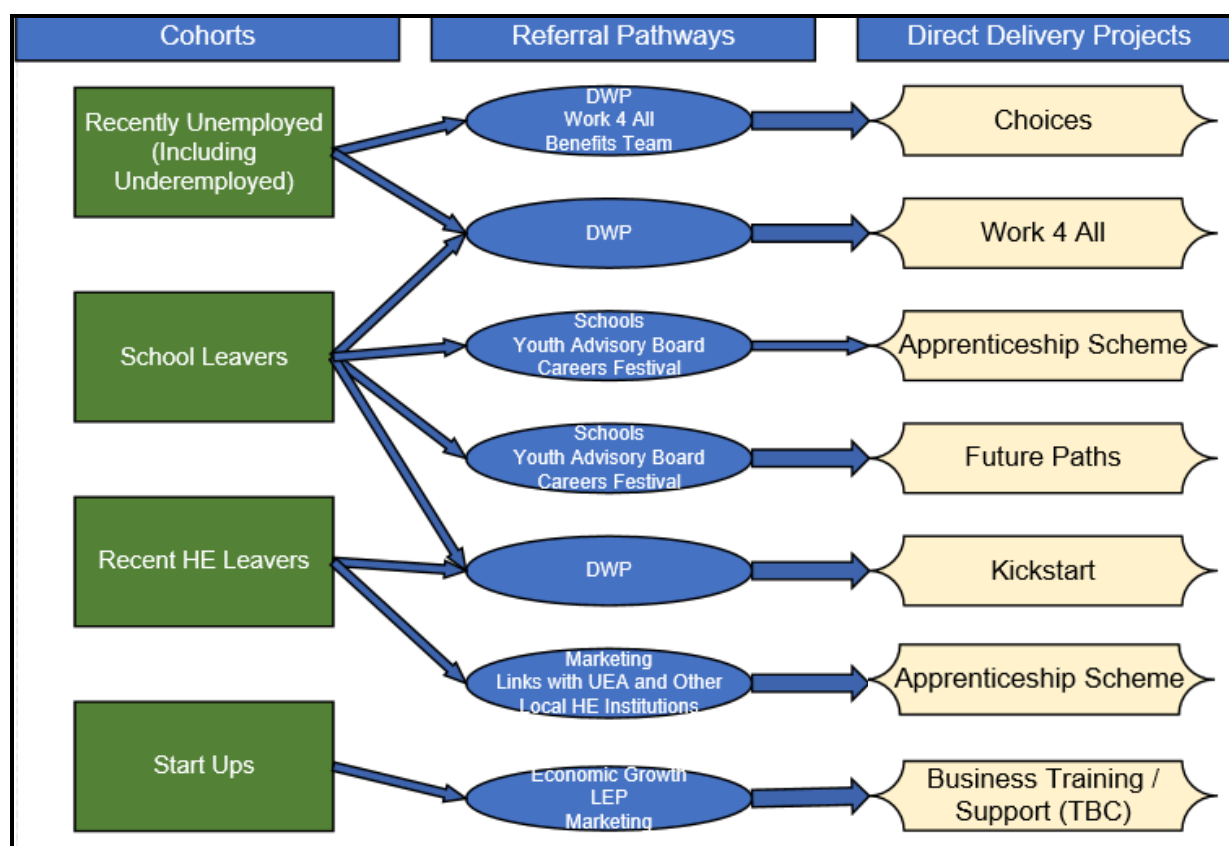
3.2.5 As models from the OECD and Office for Budget Responsibility (OBR) on the medium and long-term impacts on the economy, businesses and unemployment rely heavily on assumptions around the success (or otherwise) of the vaccination programme and the level of government support, a summary of the schemes that have been introduced by central government in order to mitigate the impacts of coronavirus on employment are also included in Appendix 2.

4. Proposed Action

4.1 Consultations were held with both internal and external stakeholders to understand the impact of their services and identify areas where the Councils could provide additional support. Appendix 3 considers the gaps in provision and sets out a possible response for each identified cohort (See figure 2). The responses are categorised in three ways:

- Direct delivery by the Councils
- Signposting / facilitating other skills and training provision
- Advocacy / influencing

Figure 2. Target Cohorts and Referral Pathways



4.2 Appendix 4 provides an outline of the delivery timeline.

4.3 The direct delivery projects are:

4.3.1 **Work 4 All** – Aim to provide person-tailored support and advice for 150 recently unemployed or underemployed residents by April 2022. The service focuses on practical support such as CV advice, links to other services and information on potential career opportunities.

4.3.2 **Choices** – Hosted at Carrowbreck, Choices offers focused training provision for 75-100 people, high quality and low throughput over a number of weeks. This is to be retargeted to the recently unemployed and scaled up (without duplicating any existing external provision) to be deliverable from other facilities and across both districts.

4.3.3 **Apprenticeship Scheme** – Provide a comprehensive apprenticeship offer, ensuring both Councils utilise their Apprenticeship Levy funding and meet the LGA's requirement (which sees apprentices make up 2.3% of the new entrant headcount). We aim to implement a stretch target to create and develop an

opportunity for collaborative apprenticeship working with partner organisations. Post-graduate apprenticeships would also be offered to increase the career paths available to those leaving higher education.

- 4.3.4 **Future Paths** – Provide 15 summer placements within the Councils for 16-18 year olds in the local area who are soon to leave education. We aim to increase this to 30 placements in the second year, with a number of placements hosted by local SMEs once the programme is refined. The programme aims to provide relevant employment experience to residents from a range of backgrounds in order to support future employment opportunities.
- 4.3.5 **Kickstart** – Government funded work experience placements for 18-24 year olds who have been out of work for over six months. As of June 2021, we have 36 placements secured, which we hope to increase to 40 within the next few weeks. 15 of the 36 placements are currently in post. We will continue to provide these placements internally and will look to increase the placements hosted at local businesses through our role as a gateway provider.
- 4.3.6 **School career advice** - Ensure that young people in our districts receive the best careers advice before starting their careers. Promoting Local Authorities / Government as a realistic and tangible career option, particularly within hard to recruit sectors e.g. planning, environmental health, occupational therapy, social care and promoting opportunities within our businesses in the districts.
- 4.4 A skills and training offer for individuals wishing to start their own business is detailed in the upcoming business support paper.
- 4.5 The availability of existing provision makes the signposting / facilitating element of the Councils' response particularly important. It will be necessary to maintain a strong awareness of the current opportunities in the skills and training arena (such as new online courses and apprenticeship opportunities) and communicate these effectively to those who would benefit.
- 4.6 Similarly, relevant opportunities for business support through skills and training will be disseminated to businesses that would benefit. The weekly business newsletter acts as an important communication channel through which to share this information, in addition to our pre-existing business advice and support functions.
- 4.7 To maximise efficiency and reduce duplication of resource, the establishment of a Skills and Training Project Board is also suggested. The Board will include relevant officers from within the organisation as well as professionals from external organisations, such as DWP and Norfolk Adult Learning. This will achieve the above aim, in addition to increasing signposting opportunities and influence for the Councils in relation to Skills and Training.

- 4.8 A review of the Choices programme is also proposed to ensure it is able to support more people, in particular those most affected by the pandemic.

4.9 Apprenticeships

- 4.9.1 Apprenticeships represent an area of opportunity, both to the training and skills agenda and for the One Team. Reasons for this include:

- The impacts of the changes to apprenticeship funding that have come into place over the last few years. The introduction of the Apprenticeship Levy has led to a reduction in lower level apprenticeships, apprenticeships in SMEs, the proportion of younger people undertaking apprenticeships and has led to a reduction of over a third in the overall number of apprenticeships offered. It did, however, lead to an increase in graduate level apprenticeships and apprenticeships for those over 25.
- Training provision and accessing the right training to support apprenticeships in the local area can also be a challenge.
- The One Team currently has underutilised Apprenticeship Levy funding amounting to approximately £70,000, alongside a number of hard to recruit to professions that support our key services, such as environmental health officers, planners and housing officers.

- 4.9.1 This gives us the opportunity to address these issues and be bold and ambitious in our leadership by creating opportunities for both our residents and our organisation. The key targets outlined in our *One Team Apprenticeship Strategy* are as follows:

- Meet the Local Government Association target of 2.3% of new entrant headcount as apprentices (April 21 to March 22). This means having 18 apprentices in place across the One Team by March 2022, which is an addition of 10 apprentices (8 apprentices currently in post) on current establishment.
- Create enough apprenticeships to fully utilise all of our Apprenticeship Levy funding (anticipated to be in the region of 24, depending on the level and length of qualification).
- Implement a stretch target to create and develop an opportunity for collaborative apprenticeship working with partner organisations.

- 4.9.2 We will focus on developing and delivering training provision and providing apprenticeship places for hard to recruit posts. In other words, we will look to 'grow our own' as part of our talent management approach. We will also

provide entry level apprenticeships and a development programme for specialist skills such as improvement professionals. Vacant apprenticeship roles in the organisation will also be open to internal candidates.

- 4.9.3 A barrier to implementing apprenticeships for certain 'hard to recruit' professions is the absence of local training providers. By scaling up our own ambition and working alongside other public agencies facing similar skills gaps, we can encourage training providers to offer courses in our area.
- 4.9.4 Our stretch target will see us employing up to an additional 6 apprentices per authority beyond the available Apprenticeship Levy, with government subsidy of training costs still available for these roles, to help increase the internal capacity in key service areas, generate a talent management pipeline and potentially sell support to other public organisations.
- 4.9.5 We will look to position ourselves in such a way as to take advantage of the pending white paper on lifelong skills announced in the Queens Speech in May¹⁴.
- 4.9.6 To support the accelerating of progress against the development of our apprenticeship workforce, a central apprenticeship budget will be established, which will be comprised of:
- Existing staffing budget for apprentices in post (circa £178,000)
 - Existing budget for vacant apprentice posts (circa £112,000)
 - Recurring underspends from within directorates funded by increasing the vacancy factor from 2% to 3.5% across all teams, with the exception of waste operations, leisure, CNC and chief officers. This would create additional resource to the apprenticeship budget of £245,000 across the two authorities.
- 4.9.7 Costs to this central pot will be managed 45:55 and will help to ensure that the One Team can:
- Maximise use of the Apprenticeship Levy while meeting the targets expressed above, along with allowing for resource to manage a more coordinated apprenticeship development scheme, allowing apprentices access to wider work placement experiences and training and development opportunities.

¹⁴ [Gov.uk - Prime Minister to revolutionise skills and training opportunities, May 2021](#)

- Ensure incentives for the organisation in creating new apprenticeship opportunities by taking the budget away from service pressures.
- Ensure that apprenticeship positions are utilised to achieve strategic objectives of creating the right talent flow for the organisation, particularly in hard to recruit areas.

5. Other Options

- 5.1 Officers considered both no action regarding the skills and training agenda and limiting the scope of our responses. While these options reduced the demand on resources, evidence suggests that as restrictions lift and government support becomes more limited, significant numbers of residents will be in need of support. The scale of the issue as explored in this paper suggests that a larger scale response is required.

6 Issues and Risks

- 6.1 **Resource Implications** – The direct delivery proposals within this paper require significant extra resource. The Covid Recovery Plan was approved by Cabinet in June and has allowed us to recruit two staff members to lead on this project. These roles are currently out to advert. We will also source some additional capacity to support with the delivery of the apprenticeship scheme.
- 6.2 **Legal Implications** – None
- 6.3 **Equality Implications** – This service is designed to have a positive impact on equality outcomes, with the aim of increasing employment opportunities for both inexperienced younger people and older working age adults who may face significant barriers in re-entering the workforce. The support proposed could potentially include individuals who have been out of the workforce for a significant period (such as carers or those with long-term health conditions).
- 6.4 **Environmental Impact** – None
- 6.5 **Crime and Disorder** – The action described in this report has the potential for a positive impact on crime and disorder. Unemployment is known to have a significant impact on crime rates.
- 6.6 **Risks** – There remains a risk that wider economic conditions will increase the scale and nature of the work required. A focus on specific cohorts seeks to mitigate this risk. There is also a risk that changes to government-imposed coronavirus restrictions will impact on our ability to undertake the actions within this paper. This can be mitigated by adopting a flexible approach to

delivery, as much of this work can be delivered remotely. A risk register will be monitored on a regular basis to ensure any future risks can be identified and addressed. Additional external capacity to deliver our apprenticeship ambition will also be required. Such support may be challenging to source given the limited movement in the current market.

7. Conclusion

- 7.1 The issues detailed in this report reflect those outlined by the Inclusive Growth Strategy, with many of the issues exacerbated by the pandemic. With government schemes designed to support both the workforce and businesses concluding in the coming months, it is imperative to ensure appropriate support is in place to support those who need it most.
- 7.2 The proposals detailed in this paper have been designed to maximise the impact of our services and to 'fill the gaps' within existing, local service provision. These proposals meet the needs of each of the target cohorts within a realistic resource constraint. Additionally, the proposals seek to benefit from partners already working in this field to create an effective and comprehensive response.
- 7.3 The successful delivery of these projects, whether directly, through signposting or advocacy, could have a significant impact on the skills and training opportunities available to our local communities.

8. Recommendations

- 8.1. To note the impacts on skills, training and the wider economy in South Norfolk and Broadland and to note the intended approach to tailor our support to specific cohorts of residents and start-up businesses.
- 8.2. To agree to the establishment of a centralised apprenticeship budget comprised of existing apprenticeship posts across all directorates, topped up through increasing the vacancy factor from 2% to 3.5% to generate an additional £245,000 from recurring underspend across both councils.

Appendices

Appendix 1 – Identifying our Target Cohorts

Cohort	Rationale for Consideration	Rationale for Pursuing
School Leavers	<ul style="list-style-type: none">• An LGA position paper on this topic reflected on higher youth unemployment as explored earlier in this report, as well as the diminished chances for the 800,000 annual school leavers.¹⁵• A survey carried out by Norfolk and Suffolk County Councils and the LEP¹⁶ highlighted the large number of apprentices who have either been made redundant, furloughed, and/or had a break in their learning. Many apprentices are also unable to complete their end point assessments due to the requirement for face to face conditions.	Those lacking work experience are at risk of being left behind in terms of employment and income. The reduction in apprenticeships and risk of job blocking from graduates forced into non-graduate level work makes this cohort a key target group for support.

¹⁵ [LGA - Rethinking Youth Participation](#)

¹⁶ [New Anglia LEP - Impact Report](#)

Young HE Leavers	<ul style="list-style-type: none"> • The number of new applicants to University during the initial lockdown period (23 March to 30 June) was 17% higher than in the same period in 2019. There was also a 30% increase among home students with an even larger increase in mature applicants. This suggests that the pandemic has led to a sharp increase in the number of people applying to university. • According to the Resolution Foundation, one year after leaving full-time education, over one-third of non-graduates and one-in-five graduates were working in sectors currently 'closed down'¹⁷. Additionally, research suggests that graduate jobs have reduced by 11% year-on-year¹⁸. • While universities provide careers support to their graduates, they are unable to provide extensive advice on employment opportunities outside of their local area. This presents a challenge for graduates trying to identify suitable opportunities in the Norfolk area. 	<p>Graduate employment is a distinct problem when compared to overall unemployment of young people and as such, a specific response is required. The large increase in graduates suggests that the issues discussed are likely to continue beyond the pandemic.</p>
Recently Unemployed (Including Underemployed)	<ul style="list-style-type: none"> • According to the Centre for Ageing Better¹⁹, workers aged 50+ who had their work disrupted during the first lockdown (by reduced hours, for example, or being furloughed), were significantly less likely to have returned to work as normal in the autumn than younger workers (53% compared with 68%). • Recent figures have shown that over 50s are twice as likely to fall into long-term unemployment once they lose their jobs, compared to younger workers. 	<p>This makes this group a key target for us to support following the end of furlough. This group may be unfamiliar with the modern job application process or may be less confident with IT. Both factors could significantly hinder their job search, despite being experienced workers.</p>

¹⁷ [Resolution Foundation, May 2020](#)

¹⁸ [High Fliers Research - Graduate Market 2020](#)

¹⁹ [Centre for Ageing Better - Labour Market Data](#)

Start Ups	<ul style="list-style-type: none"> Existing businesses (large and small) have been in receipt of a range of support measures from national and local government as well as the LEP. With furlough tapering off until September, businesses should be fully open by this cut off point, meaning that they should not require additional Covid related support. This year is expected to see a record number of companies created, with the creation of just under 85,000 in 2020²⁰. This follows a trend of increased entrepreneurship following previous recessions, such as the Great Recession in 2008/09. 	Previous recessions have seen a surge in entrepreneurship, driven by high levels of unemployment and a rebalancing of the economy. We are also more likely to have a large impact on this cohort with relatively small interventions, as many will have no experience of running a business.
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Appendix 2 – Internal and External Provision

Support	Project Name	Status	Summary
Direct Delivery	Broadland Training Services	Mostly inactive due to the pandemic. Plan to restart when safe	Offers IT, first aid and other courses from Carrowbreck House in Hellesdon. First aid provision is continuing (as it is excepted under covid restrictions).
	Choices Programme	Mostly inactive due to the pandemic. Plan to restart when allowed within restrictions	Aiming to give people who are long-term unemployed the skills they need to re-enter the labour market. Working with a small cohort of long-term unemployed residents, the scheme supports with employment skills, alongside intensive support and signposting into a range of services where appropriate
	Staff Bank	Currently implementing	A bank of potential staff for various Council teams with transferable skillsets, in order for the Councils to meet short term resource needs, in addition to providing employment

²⁰ [Smallbusiness \(Oct 2020\) - 2020 set to be record year for new companies created](#)

	Future Paths	Inactive (implementation delayed due to COVID-19)	Scheme offering summer internships to GCSE aged pupils. Rounded placements in Council teams, alongside additional skills training, including CV writing and interview experience. Will also support interns in their future career, providing advice and guidance
	Tots 2 Teens	Inactive (will restart when safe to do so)	Holiday activities for children aged five years and upwards during school holidays, focussing on skill development. Activities are held throughout the Broadland area. To be eligible, children must live or go to school in Broadland. There are large discounts for those in receipt of certain benefits. The aim is also designed to help those who could not afford childcare to continue to work over school holidays
	School careers advice	revamping	Schools' careers ambassadors who can provide role models and practical knowledge and experience to students. Staff will be recruited from across the Council, taking time from their normal roles to work with students. It is envisaged that each ambassador will allocate around 30 hours per year. Ambassadors can come from all areas of the Council but will be particularly targeted in hard to recruit careers such as Environmental Health, Planning, Building Control to help promote these sectors as careers options. However, the key characteristics will be able to engage with young people in a meaningful way.
	Kickstart²¹	Active	National scheme for young people who have been out of work for 6 months. We will be a gateway provider (providing placements of our own as well as organising placements at local businesses). As part of this, we will also be doing extra training, charging employers for this and providing pastoral support
Signposting / Facilitating	Integrated Employment Project (Work 4 All)	Starting in January 2021	Two staff refocussed (former benefits officers) to work with people who are unemployed to get them back into employment. Signposting into employment, identifying support needs, linking with training. DWP have two youth coaches in the Help Hub working alongside, focussing on young people to work on this project.
	Norfolk Skills and Careers	Will restart after COVID-19	Annual event at the Norfolk Showground, allowing young people and local organisations the opportunity to interact on skills and careers, with the aim of inspiring young people. We hosted a stand offering

²¹ [UK Government - Kickstart Scheme](#)

	Festival		information on local authority careers for young people at the last festival.
	NGDP	Active	South Norfolk and Broadland currently work with the NGDP, the national local government graduate scheme. There are currently two graduates on the scheme employed by the Councils
	Jarrold Assessment Centre	Not run this year due to COVID-19	Offers secondary school children in Norfolk a taste of assessment centre style interview processes through a full day session. South Norfolk have supported local children to take part in this programme previously
	LIFT	Completed project, with funding now reallocated	Grants from EU funding (plus some match funding) that are aimed at smaller voluntary community and social enterprise organisations (based in Norfolk or Suffolk) who help people furthest from the jobs market
	Future Booster	Completed and led to successor project of SMILE, (Not funded by SNC / BDC)	A series of workshops focussing on self-esteem and building resilience in secondary school children in Reepham. Has led to a project (SMILE) which will be delivered virtually across Broadland to support young people aged 15-19 (up to aged 25 if additional needs) with career guidance, practical access to employment support and/or support to address low self-esteem and confidence barriers to progression or aspiration. The project is live until August 2021
	Young Enterprise	Active	Young Enterprise is a national charity that works in partnership with local schools, businesses and volunteers to inspire and equip thousands of young people each year to learn and succeed through enterprise
Advocacy/ Influencing	Apprenticeships Network Norfolk	Active	Works collaboratively with providers, employers and partners to promote the profile & growth of apprenticeships across the county. Maintain a register of available apprenticeship roles for Norfolk. We engage with this group through the Skills Officer
	LEP Sector Skills Plans	Active – Being implemented	New Anglia Local Enterprise Partnership worked with sector partners to develop skills plans for the key growth and employment sectors in our region. They identify the main skills needs of each sector and agreed actions to help meet these needs
Other External Provision	LEP Start Up Programme	Active – provision is similar to pre-pandemic	This is ideal for entrepreneurs and micro-businesses at pre-launch and during early stage development, providing them with tailored advice and workshops covering topics such as business plans, management and operational systems, marketing, finance and legal, corporate social responsibility, and intellectual property rights. Delivered by LEP Business Advisers at the Growth Hub.

	Community Challenge Fund	Active	Some charities or social enterprises are eligible for the Community Challenge Fund, ran by NALEP. This supports projects that help improve the life chances of disadvantaged people in our society.
	I Can Be A...	Online tool supported by an active programme	This is a free careers inspiration tool focused on helping 12 to 25-year-olds in Norfolk and Suffolk and which helps deliver the New Anglia Youth Pledge objectives. The site provides tools such as Career Wizard and a database of Job Ideas to guide young people in choosing a career path. It also provides resources such as virtual tours, employee case-study videos and tips and tools for CV building and interview preparation, both through the website and in person through its charitable remit.
	Go Digital Funding	Closed on the 31 st March	The free scheme is designed for micro, small and medium sized businesses based in Norfolk who want to make better use of digital tools to help them grow Go Digital Link
	Help to Grow Scheme	In implementation stage	£520m has been pledged to fund free MBA-style management training courses for small businesses to improve productivity. The training will be delivered by business schools and will fund a 50% discount on software that enhances productivity
	JETS Programme	Active	A government funded scheme supporting individuals receiving “Universal Credit and New Style Jobseeker's Allowance who have been unemployed for at least 13 weeks”, during the pandemic. Support includes CV help, workshops and interview coaching, financial assistance for work clothes and advice with identifying transferable skills and matching these to growth industries
	Apprenticeship Levy Transfer Scheme	Active	New Anglia LEP's Apprenticeship Levy Transfer Scheme allows an organisation's unspent funds to be transferred to local SMEs so they can offer training opportunities and jobs to people who are not in work. This aims to maximise the amount of Apprenticeship Levy funding spent in the local area
	University Career Support Services	Throughout university and following graduation – most support services have moved online	Most universities offer careers support programmes to graduates which normally last for a number of years following graduation. Graduates are offered careers guidance, CV and application advice as well as access to numerous resources online (psychometric testing, practice interviews etc). UEA Careers Centre are active across Norfolk, through Gateway to Growth, the UEA Award and their internship programme

Other External Provision	National Funding for Traineeships	Funding proposed in the Budget - in the process of implementation	The Chancellor has pledged £126 million to develop the traineeship scheme, which will see businesses paid £3,000 instead of £2,000 per trainee. A “flexi-job” apprenticeship will also be created to allow apprentices to gain experience with various employers within a sector
	City College / Easton and Otley College	Closed during education lockdowns, currently providing services	The primary providers of vocational education in Norfolk, covering a range of qualifications from GCSE to degree level
	Gateway to Growth	Active	The project aims to boost engagement between graduates and Norfolk’s Small and Medium Enterprises (SMEs) through internships and enhanced skills training linked to Norfolk’s Enterprise hubs. The project addresses some of the problems faced by Norfolk’s economy and UEA graduates who want to remain in Norfolk after graduation but struggle to secure graduate level employment
	SWAP	Implementation Phase	Sector-based Work Academy Programme – Six-week placements for those on Universal Credit (including guaranteed interviews for permanent employment) to prepare those receiving unemployment benefits to apply for jobs in different sectors ²²
	CHANCES	Active	Offers support to vulnerable people including those with health conditions across Norfolk who receive a range of out of work benefits and who need significant support to move back into work
	RESTART	Active	RESTART is a national scheme which aims to give Universal Credit claimants who have been out of work for at least 12 months enhanced support to find jobs in their local area
	Lifelong Loan Entitlement to higher education	Ready to implement	The government’s Skills and Post-16 Education Bill includes a Lifelong Entitlement for adults to use on higher education or training at any point during their life. This entitles adults to receive equivalent of up to four years’ worth of student loans for level 4-6 qualifications.

²² [UK Government - Sector-Based Work Academy Programme Guide](#)

Appendix 3 – Mapping our Skills and Training Offer

<u>Cohort (Breakdown, Estimated Number etc.)</u>	<u>External Provision</u>	<u>Identified Gaps</u>	<u>Potential Response</u>	<u>Possible Partners / Stakeholders</u>
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Other External Provision	and training		
	£500 million for adults to gain A-level equivalent qualifications	Active	11 million adults can gain an A level-equivalent qualification for free. The devolved administrations will receive £500 million through Barnett consequentials as responsibility for skills is devolved.
	The Turing Scheme	Active (taking place from September 2021)	The government introduced a new international educational exchange scheme named the Turing Scheme. This £110 million scheme replaces Erasmus which UK students can no longer take part in. It allows young people across the UK, particularly those from disadvantaged backgrounds, to work and study across the world.

			<u>Direct Delivery</u>	<u>Signposting / Facilitating</u>	<u>Advocacy / Influence</u>	
<p>School Leavers</p> <p>There are roughly 2,260 18-year olds in our areas that leave school each year, of which 540 go into employment and 135 into apprenticeships</p> <p>Around 90 16-year olds go straight into employment following KS4, with 115 going onto apprenticeships.</p>	<ul style="list-style-type: none"> • I can be a... • Apprenticeship Levy Transfer Scheme • Apprenticeships Norfolk • City College courses • Increased national funding for traineeships • Voluntary Norfolk Young Person's coaching (at maximum capacity) • Government's Lifelong Loan Entitlement for adults to use at any point during their life on higher 	<p>The tight labour market will lead to more experienced workers taking jobs at lower levels. This will push school leavers out of the labour market, with the Kickstart scheme only working with those that have been NEET for 12 months.</p> <p>Additionally, DWP support is mainly targeted at ensuring young people secure employment, rather than finding a job they would enjoy. Young people are in need of general careers guidance to help them make decisions about their future.</p>	<ul style="list-style-type: none"> • Apprenticeship scheme • Future Paths • Integrated employment scheme (Work 4 all) • Choices • Tots 2 Teens • Kickstart 	<ul style="list-style-type: none"> • Jarrolds • Community Challenge Fund • Future Booster (SMILE) • Apprenticeship Levy Transfer Scheme • Continued engagement with the Norwich Employability Network to identify relevant opportunities 	<ul style="list-style-type: none"> • Apprenticeship podcasts • Norfolk Skills and Careers Festival 	<ul style="list-style-type: none"> • Local businesses • DWP • Apprenticeships Norfolk

	<p>education or training</p> <ul style="list-style-type: none"> • Government's Turing Scheme 					
<p>Young HE Leavers</p> <p>Based on available data, we estimate up to 250 residents aged 21-24 fall into this category (will increase with the new cohort in September)</p>	<ul style="list-style-type: none"> • University careers services provide general advice, guidance and training for students and graduates (length of time graduates are able to access these services following graduation varies) 	<p>Awareness and availability of graduate-level opportunities in the Norfolk area, especially for graduates from non-local universities</p>	<ul style="list-style-type: none"> • Replication of a programme similar to 'Gateway to Growth' • Public Sector Graduate Scheme 	<ul style="list-style-type: none"> • Continued engagement with the Norwich Employability Network to identify relevant graduate-level opportunities • UEA Internship Programme 	<ul style="list-style-type: none"> • Gateway to Growth Steering Group 	<ul style="list-style-type: none"> • UEA • 'Fireside group' • Local public sector bodies (as part of a PS Graduate Scheme) • Chamber of Commerce • LEP

Recently Unemployed (Including Underemployed)	<ul style="list-style-type: none"> • DWP Job Coaches • A range of free qualifications have been available for adults as part of the government's Lifetime Skills Guarantee²³ 	<p>People who have been out of work for 6-12 months out of work. Most support goes towards newly or long-term unemployed.</p>	<ul style="list-style-type: none"> • Choices Programme • Staff Bank • Job Search Facilities • Work4All 	<ul style="list-style-type: none"> • Range of support from New Anglia LEP • CHANCES • Engagement with the Norwich Employability Network to identify relevant opportunities 	<ul style="list-style-type: none"> • Help Hub 	<ul style="list-style-type: none"> • DWP
Start Ups 90% of South Norfolk and Broadland businesses are SMEs Pre-pandemic, roughly 1,000 businesses a year were created in our districts	<ul style="list-style-type: none"> • Broadland Business Start-Up Grants (£700) • Broadland Business Essentials Course (Free two-day start up workshop) • MBA style 	<p>National business funding has focussed upon support for existing businesses, rather than supporting entrepreneurship. Recessions are often followed by significant growth in enterprises</p>	<ul style="list-style-type: none"> • Training courses • Broadland Business Start-Up Grants (£700) • Business Essentials Course (Free two-day start up workshop) 	<ul style="list-style-type: none"> • Range of support from New Anglia LEP • Help to Grow 		<ul style="list-style-type: none"> • LEP Sector Skills Groups • Sector Groups (NAAME etc.)

²³ [Launch of free qualifications for adults - gov.uk](https://www.gov.uk/launch-of-free-qualifications-for-adults)

					management training																									
Projects	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22

Work 4 All		Officers Refocused	Programme Runs			
Choices				Review & Expansion	Programme Runs	
Apprentic- eship Scheme				Development & Partnership Work	LGA Requirement Met	Apprenticeship Levy Utilised Programme Continues
Kickstart	Ongoing - Funding Ends in December 2021					Scheme concludes
Future Paths				Marketing, Preparation and Selection		Programme Runs
Business Training Offer TBC				Proposal Agreed	Programme Runs	

EMERGENCY PLANNING STRUCTURES

Report Author: Nick Howard
Assistant Director Regulatory
01508 533787
nhoward@s-norfolk.gov.uk

Portfolio: Leader

Wards Affected: All

Purpose of the Report:

To present for decision proposals for emergency planning structures to provide a strong emergency incident response when our local communities are faced with a serious emergency threat. Specifically, a 24/7/365 Emergency Incident Officer scheme offering a guaranteed response which will require an additional annual revenue budget allocation of £13k revenue and £2k equipment, tools and clothing annually.

Recommendations:

1. Cabinet to agree to establish a 24/7/365 Emergency Incident Officer scheme offering a guaranteed response to defined serious emergency incidents, at an additional annual revenue cost of £13k revenue and £2k equipment, tools and clothing annually borne 45% BDC / 55% SNC.

1. Summary

- 1.1 Our councils have formal emergency planning responsibilities under the Civil Contingencies Act 2004 and we maintain operational emergency plans. These plans include advance planning of mechanisms for responding to protect our local communities from serious threats. Emergency plans are updated over time, in particular to reflect changes in organisational arrangements and/or learning from emergency incidents.
- 1.2 Severe weather involving heavy and persistent rainfall over 23-26 December 2020 caused serious surface water flooding and consequential river flooding locally, the worst impacts on this occasion being evidenced in South Norfolk district.
- 1.3 As officers update our operational emergency plans, a strong value has been identified in augmenting our emergency planning mechanisms with a 24/7/365 Emergency Incident Officer scheme offering a guaranteed response to the scene of a serious incident, working with local people and partner agencies to prevent or mitigate impacts and demonstrating emphatically and visibly our commitment and support. Our councils are not blue light services, nor are they the primary flooding authorities, but we have good knowledge of our local communities and their vulnerabilities, and are adept at resourceful problem-solving using local knowledge.
- 1.4 Specifically in relation to flooding, a funded out-of-hours emergency incident officer would offer a pre-planned and guaranteed response:
 - a. receiving and handling warnings and alerts from partner emergency responding agencies
 - b. travelling to and working at the scene of localised flooding to rapidly assess the threat and identify the most rapid, safe and comfortable support for affected residents
 - c. providing eyes-on coordination with wider council services and local elected members.

2. Background

- 2.1 District councils are Category 1 responders under the Civil Contingencies Act 2004. The government published in March 2021 an integrated review of security and resilience requirements, The Integrated Review will inform future policy-making for all national government departments, and whilst it focuses primarily on security it includes commitments to protect our communities from weather- and climate-related impacts. As Category 1 responders, district councils maintain operational emergency plans catering for foreseeable emergency incidents and making advance arrangements for responding to them. Emergency plans are updated regularly in light of changes in organisational structures and services, local emergency threats (severe weather/flooding and other major incidents), and significant learning points.

- 2.2 Local communities and infrastructures in Broadland and South Norfolk districts are exposed to a range of potential threats. The most common threats likely to face our local communities are: severe weather, utility failures, river/ surface water flooding, serious environmental pollution incidents, and transport accidents.
- 2.3 Severe weather involving heavy and persistent rainfall and consequences over 23rd to 29th December 2020 caused serious surface water flooding and consequential river flooding across significant parts of England from Gloucestershire through to Norfolk. Broadland district was significantly affected however the worst impacts on this occasion were evidenced in South Norfolk district. If the weather system had moved differently, the impacts in both districts could have been reversed as they are similarly vulnerable to flooding. The impacts on residents and some businesses in key affected locations were severe and lasting, with some residents understood to still be displaced from their homes.
- 2.4 The severe wet weather led to flash flooding and ditch / river flood threats arose posing very high demands on a small number of staff. Generally these demands arose in people's own time (annual leave, bank holidays, non-working days and antisocial hours). Those demands comprised:
- a) a high volume of SNC emergency out-of-hours call reception and response
 - b) staffing of sustained multi-agency incident coordination
 - c) activation and staffing of an SNC help hub
 - d) field deployment (rapid business support visits, sandbagging).

3. Current position

- 3.1 For the purposes of this report it will be helpful to reference as an example how council services responded during the December 2020 weather and flooding emergency incident. The emergency response provided to meet the needs of local communities was a credit to both councils, working alongside partner agencies, however our councils had no resourced capacity to mount an immediate on-site emergency incident response. Instead, initial incident emergency coordination with partner agencies was conducted by teleconferencing. It should be noted that very substantial support was also mobilised by the council's community help services remit to assist and advise affected local people, and delivering emergency support ranging from sandbag supplies and skips to temporary accommodation and hardship assistance.
- 3.2 The demands of the December 2020 emergency incident and limitations of existing emergency response capabilities were felt strongly by the officers who gave up much of their time, often working long hours and through the night in highly pressurised circumstances, through the Christmas period. A very large and challenging telephone call volume fell in a short time on one unpaid coordinating officer who, whilst supported by others, was faced with serious impacts. The incident triggered after council services had closed on 22nd December 2020 and much of it was concluded before daytime council services resumed following the Christmas break.

- 3.3 At present our councils do not resource an out-of-hours emergency incident response to any serious threats arising to our local communities. District councils are not obliged to offer a resourced manned out-of-hours emergency call handling or incident response service. The rapid mobilisation of a physical presence, unique contribution and visibility of council services during a major emergency incident such as localised flooding can provide a strong demonstration of close care and support for our communities. In the context of some recent local experience outlined above in this report, an early decision on emergency planning structures going forwards would enable officers to best support local communities when they face future serious emergency threats including severe weather and localised flooding.

4. Proposed action

- 4.1 Based on the current position above, it is proposed that our councils jointly establish a 24/7/365 Emergency Incident Officer scheme offering a guaranteed response to defined serious emergency incidents. Sharing the benefits and costs of this is a clear and tangible example of how the collaboration between Broadland District Council and South Norfolk Council can deliver more together efficiently and offer high support and reassurance to local people.
- 4.2 The cost would comprise of a weekly gross standby payment and an allowance for a payment for call-out to major incidents. It is impossible to predict precisely when and how much time will be involved in future incidents, however the budget of £15k is proposed and this report and the proposals are intended to reflect the vision and ambitions in the collaboration between Broadland District Council and South Norfolk Council. This payment would form part of those officers' contract of employment and is therefore being discussed with UNISON with a view to formal negotiation should this be approved by Members.
- 4.3 The role of the Emergency Incident Officer as proposed would cover three main action-centred areas numbered (a) to (c) below, together with three supporting roles numbered (d) to (f).
- a) To provide the initial call receipt and point of contact for other agencies regarding emergencies in the district. The Emergency Incident Officer would make an assessment on whether he/she needs to attend the scene and whether other council resources are required.
 - b) To attend emergency scenes under defined response commitments and/or when requested by other agencies or the officer's own determination. Once on-scene, to assess the incident and whether additional council resources are required.
 - c) To provide a visible and constructive physical presence working with local people and partner agencies to best respond to this incident without taking unacceptable risks. NB: We do not aim to replicate or disrupt any other agency's remit and responsibilities.
 - d) To brief the senior officer on actions taken at incidents and discuss/advise on whether further council action is required.

- e) To represent the Council at the Tactical Coordinating Centre (Silver) if such a facility is opened for a major incident, dependent on severity and scale of incident.
 - f) To act as staff officers/advisors to senior officers either at the council's coordinating base or at the nominated joint agencies coordinating centre.
- 4.4 The Council would look for approximately eight officers to volunteer to be trained and rostered to provide the basic cover on a one week in eight basis (although alternative cover arrangements would apply during the Christmas and New Year holiday period). The Council would also look for several officers would also provide support to the main rota as reserves who could cover for absences.
- 4.5 A senior officer would always be 'on call' on a rota system to provide senior decision making in support of the emergency incident officer. This would not require any additional payment.
- 5. Other options**
- 5.1 No other specific options have been identified to meet the community needs and achieve the same outcomes addressed in this report.
- 5.2 Cabinet could decide to approve an alternative, reduced or enhanced capability compared to that proposed.
- 6. Issues and risks**
- 6.1 Agreeing to the proposal to establish a resourced 24/7/365 emergency incident response does not lead to any new identified issues or risks beyond those inherent to the council's role as a Category 1 responder agency.
- 6.2 Cabinet could decide not to establish this capability. Not establishing the capability would leave an untenable position in the event, however frequent, of a major incident where burdensome responsibilities fall informally on specific individuals outside the terms of their employment. This would not be a safe and assured way of delivering future emergency responses.
- 6.3 Cabinet could decide to defer a decision. Deferring the decision would risk leaving present arrangements in place during any major emergency incident such as severe weather or flooding arising in the future. There are significant weather-related localised emergency incident impacts occurring more frequently in the U.K. and, following the December 2020 incident, a decision now would be favourable.
- 6.4 **Resource Implications** –The proposals in the recommendation would require an additional revenue expenditure commitment of £15k per annum.
- 6.5 **Legal Implications** – No implications have been identified.
- 6.6 **Equality Implications** – No specific impact has been identified on any individuals/groups on grounds of age, disability, gender reassignment, marriage

and civil partnership, pregnancy and maternity, race, religion/belief, sex, or sexual orientation.

- 6.7 **Environmental Impact** – The proposals contained in this report would support and enhance protection of the environment during major emergency incidents, and are beneficial.
- 6.8 **Crime and Disorder** – No implications have been identified.
- 6.9 **Risks** – The proposal is favourable to risks facing our communities and neutral in terms of creating any new risks. An early decision whether or not to approve the establishment of this capability will enable recruitment, until which time the council has no resourced staffing capability to respond in the way described, however this is not a statutory requirement. All other districts in Norfolk have paid duty officer rotas with varying degrees of response to an emergency incident.

7. Conclusion

- 7.1 The establishment of a capability as per the recommendation is the preferred option because it offers a resourced and reliable capacity together with the effective and efficient, visible response and work of our councils during the initial emergency phase of a local major incident.

8. Recommendations

- 8.1 Cabinet to agree to establish a 24/7/365 Emergency Incident Officer scheme offering a guaranteed response to defined serious emergency incidents, at an additional annual revenue cost of £13k revenue and £2k equipment, tools and clothing annually borne 45% BDC / 55% SNC.

Background papers

- 1. Civil Contingencies Act 2004
- 2. Integrated Review report, March 2021.

GREATER NORWICH LOCAL PLAN (GNLP) – SUBMISSION TO THE SECRETARY OF STATE FOR INDEPENDENT EXAMINATION

Report Author: Paul Harris
Place Shaping Manager
01603 430444
paul.harris@broadland.gov.uk

Portfolio: Planning

Wards Affected: All

Purpose of the Report:

To agree to submit the Greater Norwich Local Plan (GNLP) to the Secretary of State for independent examination.

Recommendations:

Cabinet to recommend that Council:

1. Agree that the Greater Norwich Local Plan (GNLP) is sound and to submit the Plan to the Secretary of State for independent examination subject to reaching an agreement in principle with Natural England, in the form of a signed statement of common ground, in relation to the mitigation necessary to protect sites protected under the Habitat Regulations.
2. Commit to proactively identify and bring forward sufficient Gypsy and Traveller site to meet identified needs in accordance with the criteria based policies of the current and emerging Development Plans.

3. Agree to request that the appointed independent inspector make any Main Modifications necessary to make the plan sound and legally compliant;

and,

4. Delegate authority to the Assistant Director for Planning in consultation with the Portfolio Holder for Planning, and in conjunction with Norwich City and South Norfolk Councils, to:

- a. agree minor modifications to the GNLP prior to its submission.

and,

- b. negotiate any main modifications necessary to make the GNLP Sound as part of the Independent Examination.

1. Summary

- 1.1 On 12 January 2021 Broadland District Council's Cabinet agreed to publish the pre-submission version of the Greater Norwich Local Plan (GNLP) under Regulation 19 of the Town and County Planning (Local Planning) (England) Regulations 2012. The publication of the GNLP took place between 1 February and 22 March 2021.
- 1.2 The GNLP team have reviewed and assessed the representations submitted in response to the publication of the GNLP. With the exception of matters specifically addressed by the recommendations of this report, it is concluded that the representations received have identified no significant issues, in principle, that cannot be addressed or are such as risk to the GNLP that it should not be submitted.
- 1.3 On this basis, it is therefore proposed that Council agrees to submit the Greater Norwich Local Plan (GNLP) to the Secretary of State for independent examination, subject to the caveats and delegations specified in the recommendation.

2. Background

- 2.1 Broadland District Council, Norwich City Council and South Norfolk Council are working together with Norfolk County Council to prepare the Greater Norwich Local Plan (GNLP). The GNLP builds on the long-established joint working arrangements for Greater Norwich, which delivered the Core Strategy (JCS). The JCS plans for the housing and jobs needs of the area to 2026. The GNLP will ensure that these needs continue to be met to 2038. The GNLP includes strategic planning policies and allocates individual sites for development.
- 2.2 When adopted the GNLP will become part of the Development Plan, and will replace the current Joint Core Strategy and Broadland Site Allocations DPD. The Growth Triangle Area Action Plan and the Broadland District Development Management Policies Document will not be replaced, though additional housing allocations are made through the GNLP in the Growth Triangle on a strategic site at White House Farm, Sprowston and on small sites in Rackheath. The GNLP will be used in conjunction with the adopted Area Action Plan, the Development Management Plan and Neighbourhood Plans.
- 2.3 A joint team of officers from Broadland, Norwich, South Norfolk and Norfolk County Council has prepared the GNLP. The Greater Norwich Development Partnership Board (GNDP) exercises political leadership for the planning activities carried out jointly by the Greater Norwich Local Planning Authorities. The board is made up of three member from Broadland District Council, Norwich City Council and South Norfolk Council and a member from the Broads Authority. The group is supported in its role by Director level representation from each Local Authority.
- 2.4 On 12 January 2021 Broadland District Council's Cabinet agreed to publish the pre-submission version of the Greater Norwich Local Plan (GNLP) under Regulation 19 of the Town and County Planning (Local Planning) (England)

Regulations 2012. The publication of the GNLP took place between 1 February and 22 March 2021.

- 2.5 The publication of the GNLP allowed stakeholders to make representations in respect of whether the GNLP was: 1) legally and procedurally compliant; 2) Sound¹; and 3) in compliance with the Duty to Cooperate. Regulation 19 representations are sent to the independent inspector to be considered as part of the independent examination.
- 2.6 A copy of the report of the GNLP Manager to the GNDP meeting of the 24th June 2021 is included as Appendix A. The GNDP report sets out the main issues raised in response to the publication of the GNLP. With the exception of matters set out below, for the reasons specified in the GNDP report it is concluded that representations have identified no significant issues, in principle, that cannot be addressed or are such as risk to the GNLP that it should not be submitted.
- 2.7 The exceptional matters relate to the agreement of the necessary mitigation under the Habitat Regulations and demonstrating that the plan will meet the accommodation needs of Gypsies and Travellers. The specific recommendations of this report seek to address these exceptional matters.

3. Current position/findings

- 3.1 The GNLP team have reviewed and assessed the representations submitted in response to the publication of the GNLP. Included, as Appendix A is the report of the GNLP Manager to the GNDP meeting of the 24th June 2021. This report sets out the main issues raised in response to the publication of the GNLP. For the reasons set out within the report, and with the exception of matters set out below, it is concluded that representations have identified no significant issues, in principle, that cannot be addressed or are such as risk to the GNLP that it should not be submitted.
- 3.2 The exceptional matters relate to the agreement of the necessary mitigation under the Habitat Regulations and demonstrating that the plan will meet the accommodation needs of Gypsies and Travellers. The specific recommendations of this report seek to address these exceptional matters.
- 3.3 When completed the GNLP will become part of the Development Plan, and will replace the current Joint Core Strategy and Broadland Site Allocations DPD. In doing so it will ensure that the Strategic Policies remain up-to-date and that the housing and jobs needs of the area continue to be met to 2038.
- 3.4 In respect of managing development through the determination of planning applications, to the extent that the adopted development plan policies are material to an application for planning permission the decision to grant or refuse permission must be taken in accordance with the development plan unless there are material considerations that indicate otherwise.

¹ Soundness is defined in paragraph 35 of the NPPF and requires a Local Plan to be positively prepared, justified, effective and consistent with national policy

- 3.5 Whilst policies of the development plan do not become “out-of-date” simply through the passage of time, it is important that plans are kept up-to-date in order to ensure that the policies that they contain carry full weight in the determination of planning applications.
- 3.6 Moreover, in its Planning for the Future document published in March 2020, government also set out its intention to set a deadline of December 2023 for all local authorities to have an up-to-date local plan. Indicating that government will prepare to intervene where local authorities fail to do so.
- 3.7 It is therefore important that the Council make timely progress on the production of the GNLP.

4. Proposed action

- 4.1 It is proposed that Council agrees to submit the Greater Norwich Local Plan (GNLP) to the Secretary of State for independent examination and delegates authority to the Assistant Director for Planning in consultation with the Portfolio Holder for Planning to agree minor modifications to the GNLP prior to its submission.

5. Other options

- 5.1 Council may defer the submission of the GNLP to seek further clarifications prior to its submission, seek further amendments to the plan if it considers the plan is currently unsound or no longer represents an appropriate strategy or it may resolve not to submit the GNLP for independent examination.
- 5.2 Any of the above options would cause a delay to the progress of the plan. The length of such a delay would depend on the reasons for the decision taken.
- 5.3 Any amendment to the plan that is proposed would need to be agreed independently by each of the three Councils and, depending on their significance and extent, may require further consultation on the plan or for the pre-submission publication be repeated. Such a decision would therefore likely lead to significant delays to the plan.

6. Issues and risks

- 6.1 **Resource Implications** – The GNLP is produced under an agreed budget with contributions from the three councils. Existing staff resources from each of the three authorities is also utilised to support the production of the plan. Delays in the progress of the plan are likely result in further costs being borne by each of the three authorities.
- 6.2 **Legal Implications** – The matters of whether the plan is legally and procedurally compliant, and whether the Council’s obligations under the Duty to Co-operate is a key test of the independent examination. The publication of the plan allowed for representation to be submitted in regard to the Plan’s compliance with these tests.

For the reasons set out in section 3, and with the exception of the outstanding matter related to compliance with the Habitat Regulations, it is not considered that any representations made give rise to concern that the plan has not met its legal obligations.

If adopted following a successful independent examination, an interested party has 6 weeks to apply for judicial review on the basis that the Plan, or its production, is unlawful. The pre-submission publication of the plan and its subsequent independent examination is proportionate mitigation for this risk.

In regards to the management of development, when adopted the GNLP will become part of the Development Plan for the area. In accordance with section 70(2) of the Town and County Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004, to the extent that development plan policies are material to an application for planning permission the decision must be taken in accordance with the development plan unless there are material considerations that indicate otherwise. Section 3 sets out the implications for decision making of maintaining an up-to-date Development Plan.

- 6.3 **Equality Implications** – The GNLP has been subject to EqIA.
- 6.4 **Environmental Impact** – The GNLP has been subject to Sustainability Appraisal (Incorporating Strategic Environmental Assessment) and Habitat Regulations Assessment. These
- 6.5 **Crime and Disorder** – Policy 2 of the GNLP requires development proposals to “create inclusive, resilient and safe communities.
- 6.6 **Risks** – The GNLP has been prepared under an accelerated timetable. As such it was not possible to carry out the Regulation 18D consultation that was agreed by the GNLP board on 10th July 2020 and subsequently agreed by councils’ through updates to their Local Development Schemes (LDS).

A number of mitigations measures have been put in place through the acceleration programme to minimise the additional risk posed by removing this stage of consultation.

7. Conclusion

- 7.1 For the reasons set out in section three, it is concluded that representations have identified no significant issues, in principle, that cannot be addressed or are such as risk to the GNLP that it should not be submitted.
- 7.2 In addition, the timely progress of the GNLP is important in order to ensure that the Council’s Development Plan remains effective and that the policies of the Development Plan continue to have full weight in the determination of planning application.

8. Recommendations

8.1 Cabinet to recommend that Council:

1. Agree that the Greater Norwich Local Plan (GNLP) is sound and to submit the Plan to the Secretary of State for independent examination subject to reaching an agreement in principle with Natural England, in the form of a signed statement of common ground, in relation to the mitigation necessary to protect sites protected under the Habitat Regulations.
2. Commit to proactively identify and bring forward sufficient Gypsy and Traveller site to meet identified needs in accordance with the criteria based policies of the current and emerging Development Plans.
3. Agree to request that the appointed independent inspector make any Main Modifications necessary to make the plan sound and legally compliant;

and,

4. Delegate authority to the Assistant Director for Planning in consultation with the Portfolio Holder for Planning, and in conjunction with Norwich City and South Norfolk Councils, to:

- a. agree minor modifications to the GNLP prior to its submission.

and,

- b. negotiate any main modifications necessary to make the GNLP Sound as part of the Independent Examination.

Background papers

Greater Norwich Local Plan, including changes required to the Policies map on adoption of the GNLP (shown in the settlement maps in the Sites plan) - [Downloadable Documents and Forms | GNLP](#)

Sustainability Appraisal, Statement of Consultation and other supporting documents - [Evidence Base | GNLP](#)

Please note that the summary of representations made pursuant to regulation 20 i.e. duly made representations made in response to the pre-submission publication of the GNLP, are summarised in the GNDP report included as appendix A of this report.

Copies of all representations made under regulation 20 will be submitted to the Secretary of State.

Greater Norwich Development Partnership (GNDP)		
Report title	Submission of the Greater Norwich Local Plan (GNLP)	
Date	24th June 2021	Appendix A
<u>Recommendation</u> The Board recommends member councils to: 1. Agree that the Greater Norwich Local Plan is sound and to submit the plan to the Secretary of State for independent examination subject to an agreement in principle being reached with Natural England, in the form of a signed statement of common ground, in relation to the mitigation necessary to protect sites protected under the Habitat Regulations; 2. Commit to proactively identify and bring forward sufficient Gypsy and Traveller sites to meet identified needs in accordance with the criteria-based policies of the current and emerging Development Plans. 3. Agree to request that the appointed independent inspector make any Main Modifications necessary to make the plan sound and legally compliant; and, 4. Delegate authority within the councils to: a. agree minor modifications to the GNLP prior to its submission and, b. negotiate any main modifications necessary to make the GNLP sound as part of the Independent Examination.		

Section 1 - The purpose of the report

1. The Regulation 19 stage of local plan-making, which for the GNLP took place in early 2021, provides the opportunity to make representations on the legal compliance and soundness of a draft plan. This enables:
 - a. Recommendations to be made to members about whether a plan can be submitted, or alternatively further consultation or a repeat of the Regulation 19 stage is required to enable significant changes to be made to the plan;
 - b. After submission, an Inspector to decide on whether the plan can proceed to examination and, if so, what issues that examination should cover.
2. This report sets out the main issues raised through the Regulation 19 stage of plan-making. It concludes that the representations have identified no significant issues, in principle, that cannot be addressed or are such a risk to the GNLP that it should not be submitted in the near future. The recommendation provides the caveat that submission of the plan is subject to progress being made on key issues relating to protected habitats and Gypsy and Traveller sites.
3. The recommendation also covers delegated authority at the three councils, which will need to be co-ordinated, for the sign-off of minor modifications covering issues such as corrections, updated information and clarification of supporting text stemming from representations prior to submission of the plan. Delegated authority is further recommended to negotiate main modifications during the examination, which are likely to be related to policy content. Both of these measures are the standard approach and are required for the examination to run effectively.
4. Subject to approval, the GNLP report will be considered by the councils in July to decide whether to submit the plan for examination on July 30th. If the plan is submitted at that date, examination is timetabled for November/December 2021 (subject to the Inspector) and adoption for September 2022.

Section 2 – Context

Challenges

5. The GNLP has addressed a number of challenges:

The changing context for plan-making - Since work began on the GNLP in 2016, through the three stages of consultation between 2018 and 2020, and most particularly over the last year, there has been a rapidly changing context for plan-making. In August 2020 the “Planning for the Future” white paper was published by government. It points towards a potentially radical overhaul of the planning system as a whole, including plan-making. Significantly for the GNLP, it highlighted the need for local plans to play their part in addressing the housing crisis nationally and locally. In the short term, government reiterated that the current round of plans in development such as the GNLP must be adopted by the end of 2023. In the longer term, it pointed to a quicker, more certain,

digitised planning system, with an enhanced role for local plans as the main means of public engagement on site selection and development.

Housing numbers for plans - Housing need is established locally using a national standard methodology. Changes proposed to the methodology prior to and as part of the government's August 2020 consultation have subsequently been amended and household projections and affordability data which form part of the methodology are regularly updated. Consequently, though housing need figures have changed somewhat and will change further over time, it is necessary to fix on an appropriate number to produce a plan. In addition, the need is a minimum for any plan, with local plan housing provision also having to take account of economic growth potential and of providing a buffer to ensure delivery of the housing required to address the housing crisis. The approach taken at the Regulation 18 stage of plan-making, which included a number of preferred options and alternative approaches for policies and sites, including consulting on the amount of growth and its proposed locations, has provided flexibility to make changes between plan-making stages.

Sustainable growth – the GNLP promotes the right types of growth in the right locations to facilitate post Covid-19 economic recovery, promote the post-carbon economy, address climate change impacts and support services in our communities. This has been done by maximising the potential of brownfield sites, supporting high technology employment growth, particularly in the Cambridge Norwich Tech Corridor, and providing for greenfield sites for housing growth on the edge of the urban area, towns and villages.

Protecting and enhancing habitats - to ensure growth does not have a negative impact on internationally protected habitats, work has been undertaken at the county level on addressing increased visitor pressure on those habitats. The plan also provides for the protection and enhancement of locally significant habitats and will follow on from the success of the JCS in providing improved green infrastructure.

Representations

6. **No representations have been made that in the view of officers would require further Regulation 18 consultation or a repeat of the Regulation 19 stage.** However, some representations have raised issues which must be addressed before submission, and possibly before and at the examination. In particular, work on protecting key habitats will need to be agreed with Natural England, at least in principle, to enable submission. This is set out in section 3 of this report.
7. Section 4 covers issues which are not considered to require further work prior to submission but seem likely to be dealt with at examination.
8. Overall, 1,316 representations were made on the plan (263 support and 1,053 objections). Appendix 1 provides information on the numbers of representations made in relation to different policies. Please note that this only gives a broad overview of

where concerns and support lie. This is because, for example, considerable concerns about the choice of a housing site in Hingham has been expressed primarily through a co-ordinated representation submitted by the town council rather than through large numbers of separate representations.

9. Appendix 2 provides a concise summary of the main issues raised. It is broadly organised on a policy and thematic basis, though in some cases organisations are named for clarity. A more detailed summary of representations made by different individuals and organisations, which is part of the Statement of Consultation to accompany submission of the plan, and which includes officer responses to the representations, is available [here](#). The full representations made, without officer responses, are available from the GNLP website [here](#).

Section 3 - Issues being addressed ahead of submission and beyond

10. It is anticipated that a number of issues raised through representations will be addressed, in many cases prior to, but in some cases subsequent to, submission. These are issues on which agreement can be made, or common ground identified with some outstanding elements to be debated at examination.
11. These issues will be addressed through Statements of Common Ground with organisations leading to proposed minor modifications to be submitted with the plan, or simply by the authorities proposing minor modifications to accompany submission without the need for a statement.
12. Main modifications, such as major changes to policies, cannot be made at this stage of plan-making. If the authorities are of the view that such major changes are required, another Regulation 19 stage would have to take place, or even a return to the Regulation 18 consultation stage. However, such modifications can be consulted on at examination and then recommended by the Inspector's report of the examination to enable the plan to be adopted.
13. Table 1 below sets out ongoing and anticipated work of this type. Members will be updated on progress on this work at the GNLP meeting and subsequently at Cabinets and Full Councils:

Table 1

Issue	Ongoing/required work
Duty to Cooperate (D to C)	<p>The D to C covers strategic scale cross-boundary issues between councils, infrastructure providers and organisations such as the Environment Agency, Historic England and Natural England. More local issues have been raised in some of the representations to the GNLP in relation to the D to C, which in most cases relate to concerns over the consultation process, which is different from the D to C.</p> <p>The most common D to C issue nationally which has created problems for local plans is meeting the excess housing needs of some, mainly urban, areas in neighbouring areas.</p> <p>For Greater Norwich, the Norfolk Strategic Planning Framework (NSPF) provides a series of agreements through its regularly updated Statement of Common Ground which addresses strategic D to C cross-boundary issues. However, in some cases a commitment to future joint work on more specific cross-boundary issues needs to be agreed, such as ongoing engagement with Breckland District Council on water, power and economic synergies which is being addressed through a specific Statement of Common Ground.</p> <p>In other cases, clarification on issues raised at Regulation 19 is required. This is the case with Natural England, with whom in principle agreement will be needed on addressing the issue of visitor impact on internationally protected habitats. This requires the signing of a Statement of Common Ground prior to submission of the plan. This follows from the GIRAMS work, undertaken under the NSPF, to identify avoidance and mitigation measures for potential recreational impacts, which is not yet approved. It is critical that this in principle agreement is reached through a Statement to enable the GNLP to be submitted, as compliance with the Habitats Regulations it relates to is a legal requirement. Lack of agreement with Natural England could also be judged to be a D to C failure which would prevent examination of the plan. There is a lot of work to do on this which risks the timing of submission on July 30th. If this is not achievable, submission should be considered for September.</p>
Gypsies and Travellers	<p>No sites have been submitted through the plan-making process to address evidenced need. Failure to provide for the evidenced need through specific sites in addition to the criteria-based policy for assessing applications (in policy 4 on Homes) is potentially a risk to the plan being found sound. Consequently, we are proactively engaging with existing families/site owners to explore the potential for acceptable expansion of existing sites through the development management process and continuing to explore options to find suitable land in public ownership on which to bring forward a site.</p>
Evidence updates	<p>Work is also ongoing to supplement and update the evidence base (partly in response to representations) including:</p> <ul style="list-style-type: none"> a. A request from Historic England for Heritage Assessments for a number of proposed sites (mainly in the city centre) and inclusion of other heritage evidence;

	<ul style="list-style-type: none"> b. More detail on the timing of the delivery of sites in the housing trajectory; c. Supplementary viability information; d. Updated information on housing, including the types of homes required; e. Updating of the Habitat Regulations Assessment (HRA) to explain the situation and further justify its conclusions relating to the GIRAMS and the finalisation of the Water Cycle Study.
Minor modifications	Minor modifications to the text (not the policies themselves) of the plan will be submitted mainly to address representations from Historic England, Natural England, the Environment Agency and Anglian Water. These largely relate to the Vision and Objectives, policies 2 (Sustainable Communities), 3 (Environmental Enhancement) and 4 (Infrastructure), as well as a number of site allocations. Other proposed minor modifications will cover the limited number of errors identified.

Section 4 – Potential issues for the examination

14. The actual issues for the examination will be determined by the Inspector taking account of policy and legal requirements, his or her own judgement and the representations that have been made.
15. In the light of the representations made, national policy/guidance and experience of previous examinations, the three key issues for the plan's examination (if submitted) are most likely to be:
 - a. The overall housing numbers and the locations and deliverability of growth, including site viability and the impact on climate change;
 - b. Addressing Habitats Regulations visitor pressure issues through an agreed approach with Natural England;
 - c. Provision of a site/s to meet the needs of Gypsies and Travellers (though this has not been a focus of representations, expert advice is that this is an issue).
16. Taking account of the broad range of representations made, and subject to progressing the matters set out in the recommendation, officers recommend that the plan as drafted can be submitted. We are confident that well-reasoned arguments can be provided at examination to justify the approach taken in the plan in relation to the issues raised in representations.
17. Table 2 below provides officer summaries of the potential issues for the examination based on the representations that have been made, with officer responses in relation to these issues which will be worked up further as we head towards examination. A number of the representations highlight different interpretations of the National Planning Policy Framework and its supporting guidance.
18. As referenced in paragraph 9 above, Appendix 2 provides further detail of the representations, with full representations available [here](#).

Table 2

A. Process Issues		Officer Response
Site Selection	<p>The process has been questioned at different levels of the hierarchy, including:</p> <ol style="list-style-type: none"> 1. the role of Sustainability Appraisal (SA) e.g. for sites on the edge of Hellesdon in Horsford parish, with a legal view submitted questioning site selection soundness; 2. Aylsham (the inclusion of an additional site at the Regulation 19 stage – see below); 3. Key Service Centres (particularly site selection in Hingham); 4. Village Clusters (the site selection process involving school catchments has been questioned). 	<p>In relation to representations on the process of plan-making, there is confidence that the approach we have taken is sound. This includes site selection, the use of SA, the Duty to Cooperate and the consultation process overall, including the increase in housing numbers and consequent inclusion of additional sites at the Regulation 19 stage (see below).</p> <p>The role of the SA in site selection and the wider process used in assessing sites have been clearly set out and recorded, with criteria which reflect national planning policy, county-wide and local priorities provided to guide that selection. The introductory section of the Sites Plan explains the process used and settlement booklets identify why the sites were selected in each settlement.</p>
Dependent plans	<p>The role and timing of the South Norfolk Village Clusters plan (including evidencing the amount of growth), along with the Diss and area Neighbourhood Plan's role in allocating sites has been questioned.</p>	<p>There is flexibility in how Local Plans are produced so that they can be either single or multiple volume documents. In addition, Neighbourhood Plans can allocate sites. The emerging village clusters plan in South Norfolk, now being consulted on, provides evidence that the growth required by the GNLP can be provided for in sustainable locations.</p>
Changes from Regs 18 to 19 (lack of Reg 18D consultation)	<ol style="list-style-type: none"> 1) The lack of consultation on both the overall numbers and additional sites/increased numbers has been criticised (this has particularly been raised in relation to Acle, Aylsham, Horsham St. Faith and Lingwood); 2) The inability to comment on and change settlement boundaries has been raised. 	<p>The 2012 Planning Regulations anticipate that there will be changes in whatever has been consulted upon after the Regulation 18 consultation. It is very common for new sites to be proposed for allocation for the first time at the Regulation 19 stage either because they have only recently become available or the local planning authority needs to supplement its allocations in order better to meet needs.</p> <p>At the Regulation 18C draft plan stage of the GNLP, overall housing numbers were consulted on, alternative sites were</p>

		<p>consulted on as well as those proposed for allocation, and new sites were submitted.</p> <p>The system of plan preparation would be rendered very inflexible if such changes required a further regulation 18 consultation.</p> <p>The decision to not include revisions to settlement boundaries in the plan resulted from the timetable changes stemming for the release of the “Planning for the Future” white paper. Amendments will be possible through any future review of development management policies.</p>
B. Plan content		
Overall housing growth	<p>Representations from different organisations and individuals state opposite views that the plan provides for:</p> <ul style="list-style-type: none"> • Too little housing growth (it doesn’t reflect economic aspirations and there is questioning of the methodology re. housing numbers); • Too much growth (housing need + a 5% buffer is sufficient, insufficient account has been taken of climate change, with the South Oxfordshire plan referenced as a plan challenged on the scale of growth in relation to climate change). <p>Also -</p> <ol style="list-style-type: none"> a) Windfall – a greater or lesser focus should be placed on windfall in calculating housing numbers, and policy 7.5 is considered unworkable; b) Contingency – more contingency sites are required versus none are needed. 	<p>The level of housing need for Greater Norwich is identified by using the government’s standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided.</p> <p>The challenge to the South Oxfordshire plan concerning the scale of growth and its climate change impacts was unsuccessful. Meeting housing need was identified as a key consideration as well as addressing climate change as plans need to provide for economic, social and environmental sustainability.</p> <p>The approach to windfall, which allows for some of the likely delivery to be included as part of overall housing provision, is considered appropriate. As windfall delivery is likely to remain robustly high, it is appropriate to include a limited</p>

		<p>proportion as part of total potential delivery.</p> <p>One contingency site is included should this prove to be required due to low delivery of allocated housing sites.</p> <p>The overall approach, including to windfalls, contingency and having a significant buffer, builds in flexibility to support higher than trend economic growth incorporating the Greater Norwich City Deal if this were to occur.</p>
5-year land supply	Representations (from some in the development industry) question the proposed approach to the 5-year land supply which is based on the housing need identified through the standard methodology without including the buffer.	The figure of 49,492 is potential housing delivery during the plan period, not the housing need. The need is 40,541, calculated using the standard methodology. The latter is proposed to be used to calculate 5-year housing land supply.
The location of growth	<p>1) Settlement hierarchy</p> <p>i) Suggested changes (all to include more growth in specific locations):</p> <p>(1) Wymondham should be a Large Main Town;</p> <p>(2) Mulbarton, Scole and Horsford should be Key Service Centres (KSCs);</p> <p>(3) A separate countryside category is needed.</p> <p>ii) The amount of growth in different parts of the hierarchy:</p> <p>(1) More vs. less in the urban area (sustainability + availability of sites from city centre decline vs. deliverability and market saturation issues), over reliance on Strategic Regeneration Areas with limited evidence (East Norwich and Northern City Centre) and the North East Growth Triangle.</p>	<p>1) The Settlement Hierarchy, which is based on evidence of the services available in different settlements, is considered to be appropriate. Open countryside is in the village clusters level of the hierarchy</p> <p>The overall growth strategy, including housing and jobs numbers and locations, is considered to be well-evidenced and to meet the plan's objectives. This will be achieved by focussing the great majority of growth in the Norwich urban area and in and around our towns and larger villages, thus reducing the need to travel and addressing climate change impacts. At the same time, the strategy allows for some growth in and around smaller villages to support local services. Our strategy maximises the potential of brownfield land and accessible greenfield sites. The strategy also offers a range of types and locations of sites which will help to ensure that the broad range of housing needs of our communities are met, enhancing delivery of the housing by providing opportunities for a range of house providers.</p>

	<p>(2) More/less growth in towns (less in Aylsham, more in Wymondham and Diss, new sites needed in Long Stratton).</p> <p>(3) More/less growth in KSCs – different views with focus on more in Brundall, Hethersett, Loddon, Poringland, Reepham and Wroxham vs. less in Reepham and a different site in Hingham;</p> <p>(4) More/less growth in village clusters.</p> <p>2) The lack of a Green Belt has been criticised;</p> <p>3) New Settlements – there has been questioning of the lack of inclusion of new settlements, whilst an alternative view stated is that policy 7.6 should not prejudice the next plan;</p> <p>4) The Cambridge Norwich Tech Corridor (CNTC) should be a greater focus for growth;</p> <p>5) Undeliverable sites with no promoter or developer should not be in the plan.</p>	<p>2) Regulation 18 included consultation on the potential for a Green Belt. The strategic approach of protecting valued landscapes including strategic gaps provides the policy coverage required. Establishing a Green Belt for the future at this stage will reduce flexibility and place pressure for additional growth required in the future on those areas not included in any Green Belt.</p> <p>3) The GNLP does not allocate any of the proposed new settlements as there are considered to be enough sites to meet needs in and around existing settlements. The strategy takes account of the Government's proposed changes to the planning system, with policy 7.6 setting out the intention to bring forward a new settlement or settlements through the next strategy and sets out a timetable for that work.</p> <p>4) Forming part of the defined Strategic Growth Area, the CNTC is a major growth focus. Due to high levels of existing commitment in locations such as Wymondham, Hethersett, Cringleford and Easton which are already strategic locations for growth, only limited additional housing numbers have been added in these locations in this plan.</p> <p>5) Further evidence will be submitted showing that undeliverable sites have not been allocated in the plan.</p>
Sites subject to significant/most representations	<p>1) East Norwich (the main concerns are over capacity and deliverability, including from Historic England);</p> <p>2) Anglia Square (the policy should be amended to reflect recent changed intentions concerning the site);</p> <p>3) The UEA Grounds Depot (the allocation should be deleted as the Yare Valley is a priority Green Infrastructure corridor);</p>	<p>Concerns over specific sites and locations for growth will be a key part of the examination and it will be for the Inspector to decide whether modifications are required to the policies we submit. As set out above, officers are confident that the site selection and plan-making process raised in relation to some locations has been sound.</p>

	<p>4) Aylsham (the main concerns are over the process of adding a further site at the Regulation 19 stage and over infrastructure capacity);</p> <p>5) Hingham (the main concern is over site selection);</p> <p>6) The Showground (the main concern is over transport capacity);</p> <p>7) Lingwood (the main concern is over the site selection process adding a new site at the Regulation 19 stage);</p> <p>8) Foulsham (the main concern is over an historic hedgerow);</p> <p>9) Colney (the main concern is over the non-selection of a site).</p>	
Transport	The Norwich Western Link (NWL) should not be in plan, there is insufficient focus on walking, cycling and other sustainable transport and too much focus on aviation.	Although it is not a specific plan proposal, the inclusion of the NWL road reflects its progress by Norfolk County Council as an infrastructure priority, with a Preferred Route announcement made in July 2019. This applies to other improvements to transport including to the airport, rail services, trunk and primary roads and measures to promote active and sustainable transport which are also included in the GNLP.
Climate change	There is insufficient coverage of climate change issues which should be the basis of the plan. This includes the amount, distribution and timing of growth, inadequate targets and monitoring, an inadequate approach to energy and water efficiency and flood risk.	<p>The climate change statement in the GNLP strategy sets out and justifies the broad ranging approach the plan takes to tackling climate change.</p> <p>As set out above, the strategy focusses the great majority of growth in the Norwich urban area and in and around our towns and larger villages, thus reducing the need to travel and helping to address climate change impacts. It also allows for some growth in and around smaller villages to support local services, the loss of which would generate the need for more journeys.</p> <p>The overall housing numbers in the plan are suitable to address the housing shortage in the area, allow for sustainable economic growth to contribute to post Covid-19</p>

		<p>recovery and the move to a post-carbon economy.</p> <p>The climate change targets in the plan are intentionally linked to those of the government to reflect the fact that national targets regularly change so it is appropriate that GN should contribute to those national targets. Thus, targets will be updated locally when they change nationally, as with changes made by the government this year.</p> <p>The GNLP contains policies which cover all relevant aspects of the emerging NSPF proposals for how local plans in the county should address climate change. Minor modifications to the GNLP's Delivery and Climate Change Statement and relevant text supporting policies will be submitted to provide updates on how this emerging policy advice (in agreement 19 of draft NSPF) is addressed. This is mainly achieved through the design of development required by Sustainable Communities Policy 2. The policy covers a broad range of issues related to climate change including access to services and facilities, active travel, electric vehicles, energy and water efficiency, flood risk, sustainable drainage, overheating and green infrastructure.</p>
Infrastructure	Provision is insufficient to support growth (especially for health and schools).	Appendix 1 setting out the infrastructure required to serve growth is based on evidence collected in the GNLP Infrastructure Needs Report. This has been produced by working with the relevant infrastructure providers, including Norfolk County Council for schools and health care providers for health facilities, so are the best available information which provides a planned approach to meeting growth needs. Updates will be made on an ongoing basis if and when circumstances change.
Housing	1) Affordable housing (AH) – the policy would over-deliver against need, there should be no AH requirement on student developments;	1) The homes policy is well evidenced. The affordable housing targets are based on evidence of need and have taken account of viability. Affordable housing is required on student accommodation

	<p>2) The Accessible homes and space standard requirements are not evidenced;</p> <p>3) Elderly needs should be covered by more allocations, not just general policy support;</p> <p>4) Self /Custom build shouldn't be a fixed percentage.</p>	<p>away from UEA. This is required as without doing so, the delivery of sites for student accommodation would reduce the ability to address affordable housing needs.</p> <p>2) The standards set for accessible and adaptable homes are also based on evidence of need and have taken account of viability</p> <p>3) Allocations have been made for and including housing for older people and policy 5 allows for such accommodation to be provided on any housing site.</p> <p>4) Promotion of self/custom build is a government priority. The requirement for at least 5% of plots on sites of 40 dwellings plus will support their delivery. It will not be applied if lack of need can be evidenced.</p>
Evidence	<p>Questioning of:</p> <ul style="list-style-type: none"> a) The validity of the Viability study; b) The Habitat Regulations Assessment (HRA) (and Water Cycle Study); c) The Statement of Consultation and lack of compliance with the South Norfolk Statement of Community Involvement; d) Sustainability Appraisal (SA) <ul style="list-style-type: none"> I. Non assessment of reasonable and strategic alternatives; II. Flawed assessment of specific sites; III. Supports a different strategy (there should only be limited new development in the KSCs and villages); IV. Inclusion of a contingency site is not justified; V. Carried forward sites have not been treated comparably with others; <p>5) Inadequate on carbon assessment and addressing climate change.</p>	<p>All evidence, including the Viability Study, HRA and SA has been produced by appropriate and experienced professional consultancies using the approaches required by government. As such, the evidence is considered to be robust. Discussions on the evidence base and how it has assisted in forming policy will be an important part of the examination.</p> <p>The process of plan-making, which has included three stages of Regulation 18 consultation, is considered to have complied with requirements.</p>

The Examination

19. The Inspector may, having considered differing views at examination, recommend that main modifications are required for the plan to be found sound. The authorities would have to consult on these and bring them back to the Inspector. If this does prove to be the case, members can only adopt the plan with these main modifications included. Main modifications could relate to any substantive aspect of the plan.
20. If the Inspector takes the view that there is a more serious cause for concern in relation to a major aspect of the strategy, such as the amount or the broad distribution of growth, he or she may write to the planning authorities before the hearings asking why the particular approach was adopted. Then, following initial hearings, if the Inspector concludes that an aspect of strategy is unsound, he or she may adjourn the hearings and issue an Interim Report, setting out what is considered necessary to overcome the concerns. During the adjournment, quick decision making would be required from the authorities to decide how best to proceed and bring proposals back to the Inspector.

Section 5 – Conclusion

21. To reiterate, the representations have identified no significant issues that cannot be addressed or are such a risk to the GNLP that it should not be submitted in the near future.
22. However, the timing of the submission of the plan will be key. This is particularly the case in relation to agreeing the principles of how the Habitats Regulations will be addressed with Natural England. Without this there are significant questions over the legal compliance of the plan and so its submission should be delayed. If the issues set out in the recommendation can be overcome in a short period of time, officers recommend that the plan should be submitted on July 30th. If not, delays until at least September this year will result. If submission were to be delayed to September, the plan should still be able to be adopted within the government's deadline of the end of 2023. The GNLP and then Cabinets and Full Councils will be informed of progress on these key issues to assist their consideration of submission of the plan.

Appendix 1

Representation numbers

This appendix gives a broad overview of those parts of the plan on which the most representations were made. Overall, 1,316 representations were made on the plan (263 support and 1,053 objections). As set out in paragraph 8 of the report, this is only an indication of how wide concerns or support is on issues as co-ordinated representations have been made by some groups and organisations.

Strategy

Section/policy with the most representations:

1. Policy 1 – The Sustainable Growth Strategy (86 reps)
2. Section 2 – Greater Norwich Profile (79 reps)
3. Section 3 – The Vision and Objectives (65 reps)
4. Policy 5 – Homes (57 reps)
5. Policy 3 – Environmental Protection and Enhancement (48 reps)

Section/policy with the most support comments:

1. Section 2 – Greater Norwich Profile (25 supports)
2. Policy 7.1 – The Norwich Urban Area (14 supports)
3. Section 3 – The Vision and Objectives (12 supports)
4. Policy 2 – Sustainable Communities (12 supports)
5. Policy 3 – Environmental Protection and Enhancement (10 supports)

Section/policy with the most object comments:

1. Policy 1 – The Sustainable Growth Strategy (78 objects)
2. Section 2 – Greater Norwich Profile (54 objects)
3. Section 3 – The Vision and Objectives (53 objects)
4. Policy 5 – Homes (51 objects)
5. Policy 3 – Environmental Protection and Enhancement (38 objects)

Sites

Sites with the most representations

1. General Aylsham text and settlement map (68 reps)
2. Policy 0596R – Aylsham (55 reps)
3. General Foulsham text and settlement map (30 reps)
4. East Norwich Strategic Allocation (21 reps)
5. Policy 0605 – Foulsham (18 reps)

Sites with the most support comments:

1. East Norwich Strategic Allocation (5 supports)
2. General Taverham text and settlement map (5 supports)
3. General Poringland text and settlement map (5 supports)
4. Policy 0401 – Norwich (4 supports)
5. Policy CC4 a and b – Norwich (4 supports)

Sites with the most object comments:

1. General Aylsham text and settlement map (67 objects)
2. Policy 0596R – Aylsham (54 objects)
3. General Foulsham text and settlement map (30 objects)
4. Policy 0605 – Foulsham (17 objects)
5. East Norwich Strategic Allocation (16 objects)

Appendix 2

Summary of Main Issues raised

1. The Strategy

Foreword and Introduction

Topic	Main Issues raised
Engagement with Breckland	Breckland DC wants to engage on proposals for new settlements and the South Norfolk villages, particularly to understand how development will impact on power and water infrastructure and to investigate the potential for economic synergies in the Cambridge Norwich Tech Corridor (CNTC). A range of comments covering these issues have been made in relation to a number of elements of the text and policies of the plan. Officers from the GNLP team and Breckland are working together to address consequent concerns raised over the D to C through a Statement of Common Ground (SoCG) on further future co-operative work.
The amount of housing growth	The housing number is unnecessarily high. There is no need to increase the number of houses to be built way beyond the number required by the standard methodology.
Location of growth	<ol style="list-style-type: none">1. Questioning of the North Rackheath allocation concerning the continued interest of developers; and, the viability of providing policy compliant levels of affordable housing2. The Cambridge Norwich Tech Corridor links universities in Cambridge and Norwich with research institutes and science parks, so it is questioned how the large number of homes planned for the North East Growth Triangle links to the employment in the Tech Corridor.3. Concentrating large developments on the edge of Norwich counteracts endeavours to secure an appropriate level of housing in rural villages.4. Mixed messages have been given over Wymondham - removing the 1,000-home contingency is unjustified. Furthermore, that the GNLP over relies on windfall sites, and that the South Norfolk Village Clusters Housing Site Allocations Local Plan cannot be relied upon. <p>A lack of consideration has been given to proposals in North Norfolk. Recent announcements regarding a development of 300+ houses at nearby Badgersfield will have an impact on Aylsham, as the majority of children from Badgersfield attend Aylsham High School.</p>
Process	<ol style="list-style-type: none">1. Historic England has concerns about development management policies not being reviewed concurrently with the GNLP, and particularly the lack of a strategic policy framework for taller buildings and the skyline, the detailed approach to designated and non-designated heritage assets and heritage at risk.2. The GNLP should have regard to the East Marine Plans, paying attention to the policies and guidance published by the Marine Management Organisation, as well as fulfil Duty to Cooperate obligations.3. Criticism of the approach taken to Aylsham, especially the lack of public consultation amidst the pandemic about the addition of a second site and increasing the total housing requirement to 550 homes.

	<ol style="list-style-type: none"> 4. Not holding the Reg. 18D consultation means there has been no opportunity to comment on the suitability or otherwise of new sites which were brought forward during and around the Reg. 18C consultation, nor to comment on any amendments to policies made since publication of the Reg. 18C consultation documentation. 5. To address climate change, the number of new allocations, particularly in less sustainable locations such as in most of the village clusters, should be kept to the legal minimum. Legal challenges such as that being pursued in South Oxfordshire make it clear that the soundness and legal compliance of Local Plans can be challenged on climate change grounds. Central to this challenge is the contention that South Oxfordshire District Council's Local Plan fails to comply with the Climate Change Act 2008 because of the amount of homes. 6. The GNLP and the South Norfolk Village Clusters Housing Allocations (SNVHCA) should follow the same, or at least a very similar, timetable. 7. The Reg. 19 GNLP Climate Change Statement states that 'growth in villages is located where there is good access to services to support their retention'. It is impossible for this statement to be accurate given the decoupling of the SNVCHA from the GNLP. 8. The decision not to pursue a Green Belt was taken without a full assessment of the evidence, raising questions about both the legal compliance and soundness of the Plan. To address this, CPRE Norfolk suggests a Green Belt on the 'green wedges' model. This evidence is presented in a paper by CPRE Norfolk: 'A Green Belt for Norwich?' 9. There should be closer collaboration in respect of Wroxham/Hoveton. More mention should be made of the numerous neighbourhood plans undertaken at great cost and by a lot of hard work by volunteers. There should also be some acknowledgement of the joint strategic collaboration between Broadland and South Norfolk councils and their joint management teams.
Sustainability + Environmental Impact	<ol style="list-style-type: none"> 1. Clarity is needed on the overall sustainability and environmental impact of the plan in its entirety, including the cumulative sustainability appraisal testing of other plans accompanying the Reg. 19 GNLP. The suggestion is a matrix/progress table for existing policies and allocations – from other existing and proposed DPDs and AAPs, as well as other commitments not already included in policy; 2. The GNLP should list the environmental assets of the area against the System of Environmental-Economic Accounting (SEEA).
GNLP legibility	Acknowledgement is sought that the lessons from the Joint Core Strategy concerning plan legibility have been learnt.
Future proofing	<ol style="list-style-type: none"> 1. There is a need for further analysis about how the Covid-19 pandemic has and is changing peoples' behaviours, and how the GNLP should be future-proofed against these changes. There should a statement in the introduction on how the plan is going to be continually reviewed, and reference made to the Tomorrow's Norfolk, Today's Challenge strategy. 2. The "Planning for the Future" White Paper will quickly supersede the GNLP - it would be helpful to see each council's representations to the Government's proposed changes to the planning system.

Norwich Western Link (NWL)	The NWL, and for some other large-scale road building promoted in the plan, is incompatible with the climate change statement and various other plan statements, ignores the fact that road construction induces demand and is environmentally destructive.
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Greater Norwich Profile

Topic	Main Issues raised
Norwich Western Link (NWL)	As above.
Other transport issues	<ul style="list-style-type: none"> • The GNLP should not commit to expanding the highly polluting and unsustainable aviation industry in policy 4; • Sustainable transport should be part of decision making, be included in the plan and form part of the assessment for development sites; • Respondents dispute the claim that the cycle network is good; • Compulsory installation of electric vehicle charging points is required in houses; • There should be a greater focus on hydrogen-based energy and transport solutions; • Tension exists between carbon emissions being above the national average in rural parts of the area (partly due to a greater reliance on car journeys), the target to reduce carbon emissions, the lack of frequent low-carbon public transport, and the excessive numbers of housing planned.
Housing numbers and Green Belt	<ul style="list-style-type: none"> • CPRE Norfolk view that: <ul style="list-style-type: none"> ○ non-inclusion of a Green Belt (suggested on the 'green wedges' model) is unsound. ○ housing numbers are too high and should be based on the standard methodology + a 5% buffer (this view is shared by individuals, who also state that Brexit and Covid-19 will reduce housing need). • Population projections may change and economic forecasts are too optimistic. By putting forward a higher number of homes to be built, the increase in supply will increase the demand. • Objection to traditional planning approach analysing past trends, projecting them into the future and converting the figures into land requirements. • The 2018 household projections do not actually go far enough. There is no 'slack' in the plan for unexpected growth, or growth in the most sustainable locations.
Location of growth	The proportion of greenfield development (78%) is too high especially as office/ retail space in the city centre will be available for redevelopment.
Engagement with Breckland DC	As above.
Infrastructure Needs	The plan needs to refer to the Health and Wellbeing section to the Norfolk Joint Strategic Needs Assessment (JSNA) which is the standard tool when predicting future health needs and trends in order to inform on housing and other factors.

Views from groups and about specific locations	
Norwich Green Party	<p>The Norwich Area Transportation Strategy has been successful in reducing vehicles entering the city centre and increasing the numbers of journeys on foot and by bike, but is a very long way from delivering an upgraded bus infrastructure plan (in the JCS). Suggest that:</p> <ul style="list-style-type: none"> • text and policies should place a greater focus on sustainable transport; • county council seeking much larger road schemes than is necessary for addressing localised problems or for serving new development. <p>The following changes are needed /considerations should be taken account of:</p> <ul style="list-style-type: none"> • An overall carbon budget for Greater Norwich to 2050 consistent with the Climate Change Act 2008 is needed, supported by a strategy and policies in line with the carbon budget trajectory. The Tyndall Centre shows Norwich must cut its carbon emissions by 13% every year to meet its contribution to Net Zero, Broadland and South Norfolk must make cuts of 13% and 14.25% respectively. Carbon emission contribution to sea level rise is a concern. • A lower housing number (42,568 dwellings plus a 5% buffer) is needed resulting in lower development pressures on greenfield sites; • Growth should be concentrated in high density low car developments close to sustainable transport hubs, with a higher concentration around Norwich; • No dispersal of development to small villages which lack services; • No new garden city settlements in open countryside distant from railheads; • Protection of Green Wedges around Norwich; • Development should be built to zero carbon standards that include renewable heating based on renewable energy generation; • Retrofitting of historic development needed; • A transport strategy is needed based on traffic reduction and a high degree of modal shift to bus, walking and cycling; • Norwich Western Link should be abandoned and there should be no further major increases in road capacity; • High nitrogen dioxide levels should be addressed, notably at Castle Meadow.
Natural England	<p>The natural environment section is incomplete, with more focus needed on biodiversity loss, climate change, habitat fragmentation, pollution etc and how the proposed plan may impact on and address these issues. The plan also needs to recognise that recreational disturbance impacts affect not just internationally designated sites, but also locally protected sites.</p>
RSPB	<p>The plan needs to cover other land use categories where soil is an important resource e.g. peat soils provide for carbon capture + habitats.</p>
The Environment Agency	<p>There is no information about the Water Framework Directive (WFD) and risk to water quality. No links are made to risk from development, or that preventing deterioration is a requirement.</p>
Stop Norwich Urbanisation (SNUB)	<ul style="list-style-type: none"> • Questions how London in 90 and plan for a rail halt at Rackheath are addressed; • The expense of exemplar eco-homes in Rackheath questions how planners can insist on deliverable carbon neutral housing; • More references to sustainable drainage systems are needed.

Location specific representations	<ul style="list-style-type: none"> • The plan should acknowledge that development at Rackheath will affect the village of Salhouse due to shared facilities; • Coltishall PC has concerns about the village suffering further from traffic growth due the NWL road and dispersed housing development; • A development promoter supports the Strategic Housing Market Assessment. requirement of 3,900 additional communal establishment places for over 75s. A non-allocated care village at Barnham Broom has potential to help to meet the need; • Concern from Bunwell PC about how large-scale developments, such as at Long Stratton, affects villages e.g. high school capacity; • Concerns over primary and secondary school capacity and funding due to the delay in the Rackheath North development; • Aylsham needs a new primary school now and cannot wait until new development is partially or fully completed; • Colney Hall should be removed from the plan as it is outside settlement boundaries; • BAW 2, Bawburgh and Colney Lakes is allocated for a water-based country park but the 2009 Colney Parish Plan suggested a much less intrusive approach. The BAW 2 land should be part of a Norwich Greenbelt involving the Yare Valley.
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Vision and Objectives (V + O)

Topic	Main Issues raised
Support	
Community Facilities and Green Infrastructure	<ol style="list-style-type: none"> 1. Sport England support the development of sustainable communities with good access to green infrastructure, sports facilities, and better opportunities to enjoy healthy and active lifestyles. 2. Rackheath PC state that any new community facilities should be offered within the remit of the Parish Council. 3. Norfolk Biodiversity Partnership support access to greenspace as a key part of what makes a community healthy and attractive.
Water Quality	The Environment Agency supports the V + O but would like to see additional wording on water quality.
Objections	
Scale of growth	The scale of growth is incompatible with achieving the V + O.
Location of Growth	<p>Reps. from the development industry:</p> <ul style="list-style-type: none"> • A new settlement or garden village would better achieve net zero carbon emission development better than 'edge of settlement piecemeal growth'. • The Vision should be strengthened on the importance of the economy in the countryside. <p>Other reps. have stated that windfall conceals the scale of development proposed in villages in South Norfolk.</p>

Growth in Main Towns and KSCs (particularly Aylsham)	<p>Concern expressed by individuals and the Town Council that additional growth in Aylsham included in the Regulation 19 draft plan:</p> <ul style="list-style-type: none"> ○ Is not compatible with the objectives that <i>people should have access to facilities and protecting and enhancing the distinctive characteristics of towns</i>; ○ Will make the scale of growth in Aylsham so great (at 15%) that it will not be possible to integrate existing and new communities; ○ Has not been consulted on and/or gone through the full democratic/plan-making process; ○ Will not be supported by adequate infrastructure, with concern over the need for timely provision of a primary school and transport issues; ○ Extra housing would have to meet carbon neutral standards to ensure greater efficiency in water and energy usage to achieve the V + O. <p>Concern also expressed over the scale of growth in main towns and KSCs overall, in particular in Reepham.</p>
Norwich Western Link (NWL)	<p>Reps. on the NWL from the “Stop the Western Link” campaign (SWL), which comprises ecologists, scientists, lawyers, academics and environmentalists:</p> <ul style="list-style-type: none"> ○ argue that the NWL should be suspended; ○ strongly object to the inclusion of the NWL within the GNLP, stating the plan purports to exclude the NWL when it is manifestly obvious the intention is to include it. SWL finds this pretence to be wholly objectionable. <p>A number of individuals and the CPRE are also oppose the NWL on environmental grounds (destruction of valuable habitats and damage to chalk streams), stating it is in conflict with the green agenda that is expressed later in the strategy, including reducing private car journeys and emissions.</p>
Historic/Natural Environment and Landscapes	<ol style="list-style-type: none"> 1. Representations from Historic England and Natural England propose changes to text on the environment. Historic England have also requested protecting landscapes to be in the V + O. 2. RSPB request clarification on how and by whom the environment will be maintained and enhanced, pointing to the role of landowners.
Quality and density of homes	<p>CPRE contends that it is impossible to ensure that homes will be built at appropriate densities in relation to local character given the independence of the plan for the South Norfolk villages, including concerns over the “minimum” 1,200 figure in the South Norfolk clusters as this has not been consulted on and figures could be much higher.</p>
Carbon monitoring and targets	<p>The Centre for Sustainable Energy recommends taking an approach similar to Manchester based on analysis carried out by the Tyndall Centre which considers baseline emissions and sets a carbon budget. It also suggests that the economy objective should be more explicit about carbon emission reductions and that the infrastructure objective is strengthened to reflect the scale of infrastructure provision required to deliver zero carbon. Other representations have pointed to:</p> <ul style="list-style-type: none"> • the need for a comprehensive baseline, targets and monitoring of the plan based on reductions from 1990 carbon emission figures; • the need to reduce transport emissions in rural areas which should be key to the growth strategy by reducing growth in rural areas.

Working with Breckland	Breckland DC comments as above.
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Delivery and Climate Change Statements

Topic	Main Issues raised
Delivery Statement	
Legal process	Reps. from members of the public in relation to Reepham and Aylsham questioned the legality of the plan-making process in relation to consultation (particularly in relation to additional housing numbers and sites at the Regulation 19 stage), including failure to engage with those parish/town councils through the Duty to Cooperate or to take note of local views expressed through consultations.
Working with the private sector	The GNLP committing to working with the private sector to overcome constraints to planning is an insult to all who live and work in communities, including all town and parish councils.
Location of growth	<ol style="list-style-type: none"> 1. Development should be concentrated within the Norwich urban area; 2. The plan should allow for more employment development within the countryside where a rural location can be justified.
Infrastructure	Reference should be made to Norfolk Constabulary's potential infrastructure needs.
Climate Change Statement	
	The Environment Agency supports the climate change statement.
Growth in Aylsham	Additional growth in Aylsham with two sites on the edge of the settlement is not compatible with reducing carbon emissions.
Norwich Western Link road (NWL)	The NWL is incompatible with the climate change statement by leading to increased usage of the private car and increase carbon emissions, as well as damaging the Wensum Valley.
The scale of growth and its environmental impact	<p>Unacceptable climate change and environmental impact of the amount of overall growth with concerns over:</p> <ul style="list-style-type: none"> • resource use, including insufficient standards for energy efficiency (Norfolk Wildlife Trust stated this is the case compared to other authorities) and water efficiency; • the level of population growth, inward migration and continued development, which could better be met elsewhere in the country, being inappropriate for Greater Norwich; • biodiversity (including the need to further promote net gain and green infrastructure in rural and urban areas), reducing overheating, ecosystem protection and the loss of greenfield land; • limited local service provision in new developments; • over reliance on the car and lack of provision for infrastructure for electric cars; • improvements required to rural public transport.
The location of growth	<ol style="list-style-type: none"> 1. The location of growth should address climate change. This should result in inclusion of the "additional" brownfield urban sites, such as those in East Norwich, and the withdrawal of many of the proposed sites in rural locations; 2. The amount of growth in KSCs and the Main Towns is too high.

	The statement and the strategy should be flexible over certain developments which require rural locations and can incorporate sustainability in their design.
Carbon monitoring and targets	<ol style="list-style-type: none"> 1. There's a lack of an effective baseline and carbon reduction targets required for the GNLP to demonstrate how it will meet its legal obligations, with carbon reduction required at the core of all policies; 2. The GNLP approach to carbon reduction is not urgent enough.
Historic environment	Historic England point to the need to reference climate change and the historic environment.

Policy 1 The Growth Strategy

Whilst a number of representations, mainly from the development industry, support policy 1's overall growth strategy, the great majority of representations as set out in the table were objections:

Topic	Main Issues raised
Main issues raised of direct relevance to policy 1	
Procedural Issues	Duty to Cooperate (D to C) <ol style="list-style-type: none"> 1. The GNLP departs from some of the agreements (nos. in brackets) in the NSPF so the D to C has not been met, including: <ol style="list-style-type: none"> a. The planned job growth is not matched by the housing requirement (3); b. The economic needs forecasts use Experian rather EEFM as per the NSPF; c. The housing requirement is not high enough to address the City Deal (13); d. There are insufficient homes for the elderly and students (14). 2. Breckland DC are concerned (particularly over transport issues and energy and water supplies) that there has been insufficient cooperation over the growth in the Strategic Growth Area and South Norfolk villages. 3. A number of respondents (town/parish councils and individuals) have stated that failure to consult sufficiently is a failure on the D to C.
	Consultation <ul style="list-style-type: none"> • The change in housing numbers between Regs. 18 and 19 and the inclusion of an additional site in Aylsham requires additional Reg.18 consultation; • Policies have not followed from the majority consultee response at Reg 18A (on windfall).
	Dependent Plans <ul style="list-style-type: none"> • Can't rely on Diss and South Norfolk Village Clusters sites which will not be tested through the GNLP; • To address the policy vacuum, DM policies for residential applications in the South Norfolk Village Clusters needed.
	New settlements references and policy should be deleted or amended to identify that <i>opportunities will be explored</i> (alongside other options for growth), rather than prejudging a future plan.

Evidence	<ol style="list-style-type: none"> 1. A new Housing/Economic Needs Assessment should be completed before submission. 2. There is no evidence from SoCGs on the anticipated levels of delivery and/or viability of the current or uplifted site allocations. Concerns: <ul style="list-style-type: none"> • that the levels of housing proposed will not be delivered on sites already allocated for over five years; • over a lack of evidence on the uplift in the density on some existing allocations being achievable. 3. Up-to-date evidence base on open space and play is required.
The amount of growth	<p>Climate Change and Growth</p> <ol style="list-style-type: none"> 1. The plan prioritises economic growth and development over legal requirements on climate change, leading to carbon leakage. 2. A large buffer makes it almost certain that climate change targets will not be met. South Oxon's Local Plan makes it clear that plans can be challenged on climate change grounds. 3. Housing numbers should not be above housing need to minimise: <ul style="list-style-type: none"> • embedded carbon emissions in construction; • emissions from energy and transport emissions. 4. The plan has deferred including climate change policies that will deliver the lowest carbon homes despite the recent NSPF (Ag. 19). <p>Overly dispersed growth is not the best strategy re. climate change.</p> <p>Housing need is higher than in the plan because:</p> <ul style="list-style-type: none"> • The standard method has been miscalculated and is a starting point, with the government's aim to significantly increase housing supply; • Full account isn't taken of the needs of students and older people; • There's a shortfall of 3,704 homes from the City Deal; • The SHMA provides support for a higher local housing need, including affordable housing, than the standard method. <p>Clarity on the methodology used to calculate housing need, along with details of the timing of delivery of allocated sites in the trajectory, should be provided on submission.</p> <p>The housing requirement</p> <ol style="list-style-type: none"> 1. The GNLP is ambiguous and there is no housing requirement set out in strategic policies. A number of reps. (from the development industry) criticise the requirement/target for being too low: <ul style="list-style-type: none"> • Based on the higher housing need and the existing JCS trajectory overestimates, the housing requirement should be 53,207 homes, which includes a buffer of around 24% (18,847 homes 2020-26 and 29,120 from 2026-38); • A higher requirement will aid post Covid-19 recovery; • Others state the buffer should be around 20% but should not include any windfall.

	<p>2. A number of reps. (CPRE, green groups, individuals) state the requirement is too high, most stating that it should be 42,568 (the housing need of 40,541+ 5% buffer), to</p> <ul style="list-style-type: none"> • reduce environmental harm and climate change impacts; • reflect recent demographic changes; • protect the countryside and retain the character of Norfolk; • reflect issues over water supply and quality; • focus growth elsewhere in country where there are more regeneration needs and brownfield opportunities and better infrastructure, reducing the need for internal migration; • prioritise delivery of existing JCS allocations; • allow for flexibility in a time of uncertainty - the housing figures need to be reviewed against Covid-19 and Brexit impacts. <p>3. Many added there should be more use of windfalls in the numbers.</p> <p>4. The Government's continuance of the existing methodology confirms the housing need as 40,541 so there is no need to add 5,000 homes (no need to take account of 2018 projections or the direction of travel in Planning for the Future).</p> <p>5. CPRE and others variously argue that:</p> <ul style="list-style-type: none"> • housing need can be met through completions (2018 – 20), windfall and brownfield sites, so new greenfield allocations and policy 7.5 are not needed; • there should be phasing of delivery for any homes above housing need included following revisions to the standard methodology; • newly allocated sites should be phased to deliver after commitment; • there is no need for a contingency site. <p>5-year land supply</p> <p>1. The 5-year land supply should not be assessed against housing need, but rather against the total housing figure in the plan.</p> <p>2. The high housing targets in the JCS have led to developers winning appeals on unallocated greenfield sites on 5-year supply grounds so should not be repeated.</p> <p>Employment land</p> <p>1. Over-delivery of employment land as per allocations will lead to either a higher housing requirement or more in-commuting. If monitoring indicates either, review of the GNLPP will be needed.</p> <p>2. Reassessment of undeveloped allocated employment sites should lead to undeliverable sites being replaced by alternative allocations, including rural brownfield sites.</p>
<p>Location of growth</p>	<p>Settlement Hierarchy</p> <p>1. Clarity is needed on the purpose of the hierarchy and how it has been used to inform the distribution of growth.</p> <p>2. Various respondents have stated that the hierarchy should be changed as, due to their level of services/existing populations:</p>

	<ul style="list-style-type: none"> • Wymondham should have its own separate classification as a “Large main town” (with more growth); • Mulbarton, Scole and Horsford should be Key Service Centres (KSCs) (with more growth). • Village clusters are based on a questionable approach using school catchments (and numbers should be reduced as the strategy has too great an element of dispersal); • The countryside should be identified in the settlement hierarchy enabling the growth of the rural economy. <p>Other comments</p> <p>Various other reps. (mainly from the development industry) have stated:</p> <ol style="list-style-type: none"> 1. In line with the existing strategic approach in the JCS, more growth should be focussed in and around the urban area; 2. Disproportionate levels of delivery proposed in the Norwich urban area will be challenging to deliver and allocations should be distributed more evenly across the hierarchy to ensure diversity, choice, competition and delivery; 3. More growth should be in Main Towns (Wymondham, Aylsham and Long Stratton are specifically identified) and KSCs to support rural economies and ensure delivery. These are even more integral to sustainability due to the current pandemic (home-working, reliance on local services, access to open space); 4. Housing numbers in village clusters should be reduced; 5. New settlements are needed in this plan to create sustainable, beautiful places with clean growth, including promoting strategic growth area/tech corridor. <p>Undeliverable existing/additional allocated homes, particularly on strategic sites, should be redistributed to the most sustainable and deliverable locations (e.g. Wymondham).</p> <p>Reps. from CPRE, parish and town councils, individuals and environmental/political groups, stated:</p> <ul style="list-style-type: none"> • More homes should be concentrated in Norwich using brownfield sites and by converting redundant retail and office space; • The village cluster housing numbers are too high due to lack of service provision and increased traffic generation leading to increased carbon emissions, with electric cars doing little to limit impacts. No further allocations beyond those from the JCS should be made in villages, with windfall policy 7.5 removed in favour of prioritising rural exemption sites for affordable housing; • A Green Belt on the Green Wedges model should be included to protect against urban sprawl; • ONS (2018) project that 95% of household increase in the plan period will be 1 or 2 person households so suburban housing estates are the wrong solution. <p>Aylsham - Reps. from the town council and others state that housing numbers in the town should be reduced with the removal of the site added between Regs. 18 and 19.</p>
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	Breckland DC have concerns over the focus of growth in the A11 Corridor, fearing implications for water and energy supplies and transport in the growth corridor in their district, the cumulative growth including both South Norfolk village cluster allocations and potential new settlements.
Green Infrastructure	Natural England state that the policy needs to be strengthened with regard to the delivery of green infrastructure with cross references to policy 3.
Non policy 1 issues raised A number of significant issues were raised under policy 1 which are of greater relevance to other plan policies plan	
Infrastructure	<ul style="list-style-type: none"> • The Norwich Western Link (NWL) A number of reps. stated that the NWL should not be promoted through the GNLP or transport plans, with the main focus of opposition on impact on the Wensum SAC and increased emissions. • A140 Omission of the upgrading of the A140 between Norwich and Ipswich and concentrating employment in the A11 corridor will not take advantage of growth generated by Freeport East at Felixstowe. • Infrastructure needs are referenced but not quantified, with no indications of where or how they will be provided.
Sustainability Appraisal	No evidence in the Reg. 19 SA that land allocation has been selected based on the least environmental value or of a hierarchy of sustainability compliance.
Sites	A number of proposed allocated and non-allocated sites were supported as they could implement policy 1.
Energy efficiency	Lobby central government to insist on carbon zero building standards. For much of the plan period, the highest standards will not be required. Whole Life Cycle assessments for housing construction (as per London) and elimination of fossil fuel heating are required to reduce emissions.

Policy 2 Sustainable Communities

Topic	Main Issues raised
Water Efficiency	<ol style="list-style-type: none"> 1. No justification for applying an unknown potential future government requirement; should be dealt with through a future local plan review 2. Will policies on water efficiency be sufficient to cope with the cumulative growth of both the GNLP and Breckland?
Climate Change/Energy	<ol style="list-style-type: none"> 1. No coherent climate adaptation policy; policy on climate change, energy etc is inadequate; does not reflect Government carbon emission targets; 2. Electric vehicles will put further pressure on the already constrained energy network; 3. Requirements for energy charging points cannot be in SPD; 4. Requirements for energy charging points have not been taken into account in viability; 5. Requirement for a 20% (or 19%) reduction against Part L of the 2013 Building Regulations is not supported by the evidence; 6. The Greater Norwich Energy Infrastructure Study did not consider neighbouring Breckland district's power needs for the growth already in progress at Attleborough and Snetterton Heath or at Dereham.
Landscape	Reference to strategic gap policies should be deleted.

Policy 3 Environmental Protection and Enhancement

Topic	Main Issues raised
Main issues raised of direct relevance	
The Built and Historic Environment	<ol style="list-style-type: none"> 1. Include more about the distinctive, unique heritage of the area to make the policy more locally specific; 2. Add reference (policy and text) to Historic Landscape Characterisation and Landscape Character Assessments; 3. Need for a historic environment topic paper, Heritage Impact Assessments of certain sites and also taller buildings evidence base.
The Natural Environment	<ol style="list-style-type: none"> 1. Natural England state that there are insufficient measures to ensure that adverse effects on European Sites from visitor pressure would be avoided (as GIRAMS is not adopted). Therefore, the plan is not in compliance with the Habitats Regulations; 2. Biodiversity net gain not included in viability – not demonstrated that allocations are deliverable; 3. To deliver biodiversity net gain off-site there must be a mechanism for developers to pay into a central pot that will be used to deliver biodiversity; 4. The need for GI to be met by development is not adequately defined; 5. The policy and supporting text are inadequate to protect, maintain, restore and enhance the natural environmental assets of the area; 6. Need to explain the hierarchies of site protection and mitigation.

Policy 4 Strategic Infrastructure

Topic	Main Issues raised
Transport	<ol style="list-style-type: none"> 1. Too much emphasis on traditional modes of transport and associated schemes, not enough detail on promoting walking, cycling and other forms of sustainable transport; 2. The policy does not go far enough in terms of reducing carbon emissions and tackling climate change; 3. Opposition to the possible construction of Norwich Western Link on the grounds of environmental damage; 4. Concerns that the lack of an up to date transport planning/evidence base (e.g. LTP4 is still in draft stage) means there is disconnect between sustainable transport and spatial growth planning.
Other Strategic Infrastructure	<ol style="list-style-type: none"> 1. Anglian Water has asked for minor modifications over some terminology; 2. No coverage of waste-water infrastructure, the Water Cycle study and the Water Framework Directive; 3. Norfolk Constabulary should be included within the strategic infrastructure element of policy 4, like health Infrastructure. There should also be a specific reference to a (forthcoming) Police Infrastructure Delivery Paper; 4. There is no detail on the delivery of strategic Green Infrastructure (GI); 5. There is no mechanism to secure education infrastructure.

General	<ol style="list-style-type: none"> 1. Agents have promoted specific sites that they believe to be suitable to support the vision and ambition set out in Policy 4; 2. Breckland District Council has concerns that the cumulative impact of growth identified in the plan could cause further strain on local power and water resources, waste management and transport infrastructure.
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Policy 5 Homes

Topic	Main Issues raised
Affordable Housing	<ol style="list-style-type: none"> 1. The 28% and 33% affordable housing policy, if achieved, would over-deliver against the identified need; 2. The reference to 'at least' 33% is ambiguous.
Viability Testing	Greenfield sites can face high development costs so viability testing should be allowed for at the planning applicate stage (as is allowed for brownfield sites).
Space Standards	There appears to be no robust evidence that would suggest that development below space standards is a concern in the GNLP area. The policy should provide flexibility to recognise need and viability, where necessary.
Accessible Housing	It will either be necessary to demonstrate a need for accessible housing or delete this part of the policy.
Specialist Housing	The need for 3,857 specialist retirement units in the plan area is based on evidence which is not currently publicly available. Even with the allocations proposed, there remains a significant unmet need for retirement homes and/or beds in residential institutions. Specialist housing for older people cannot be expected on mainstream housing sites and these should be addressed by specific allocations (see Inspector's report on the Vale of Aylesbury Local Plan Policy H6).
Purpose built Student Accommodation (PBSA)	PBSA should not be expected to contribute towards affordable housing provision. Paragraph 64(b) of the NPPF states that PBSA is exempt.
Self/Custom-Build	<ol style="list-style-type: none"> 1. The Councils need to consider the robustness of their self-build register as an evidence base and indicator for demand for self-build plots; 2. The Self/Custom-build has not been tested in viability appraisal work; 3. Objections to fixed percentage for serviced self-build plots on larger housing sites (best in windfall policy 7.5).

Policy 6 The Economy (including Retail)

General points	Main Issues raised
	<ol style="list-style-type: none">1. Most responses relate to the promotion of particular sites;2. There is a need for greater flexibility for the reuse/redevelopment of existing businesses;3. There is a need to allocate more land, including a large site, smaller sites and land for other types of employment generating uses;4. There is a need to ensure housing supports sustainable economic growth including town centres, the Cambridge Norwich Tech Corridor (CNTC) and the City Deal;5. The plan fails to capitalise on the opportunity to further support and direct employment growth to the CNTC;6. There are insufficient opportunities for economic development in rural areas;7. There is a need to allocate land to meet the needs of one particular business;8. There are concerns about the cumulative scale of growth, particularly in the CNTC, on Breckland;9. The policy does not provide the mechanisms to deliver jobs that fall outside the old B-class uses – the representation has been made in support of unallocated housing sites that include schools and care facilities.

Policy 7 Strategy for the Areas of Growth

Introduction

Topic	Main Issues raised
Process Issues	<ol style="list-style-type: none">1. Flawed site assessment process (many reps. suggest flaws with the assessment process or HELAA or SA);2. Lack of consultation about increase in numbers at Aylsham;3. Objection to separate South Norfolk Village Clusters Plan.

Policy 7.1 The Norwich Urban Area including the fringe parishes

Topic	Main Issues raised
General	<ol style="list-style-type: none">1. Historic England state that the GNLP should include a policy for taller buildings and the skyline (a recommended scope of a study is provided in the rep.);2. Amend so that all the figures for the allocations are identified as minimums;3. Smaller employment sites should be allocated in key locations to address the impact of housing growth;4. Breckland DC has expressed concerns over the impact of cumulative growth.

The City Centre	Northern City Centre <ol style="list-style-type: none"> 1. The agent for the developer of Anglia Square suggests a number of amendments to align policy GNLP0506 with emerging proposals. 2. Clarification is needed that the objective to preserve office accommodation, potentially via an Article 4 Direction, would not apply to Anglia Square, where redevelopment of redundant offices for homes is welcomed. 3. Historic England continues to have significant concerns regarding the approach to development at Anglia Square, including the lack of an HIA; 4. The Northern City Centre Strategic Regeneration Area has a lot of uncertainty and potential for delay re. the Anglia Square allocation.
	Other elements of city centre policy <ol style="list-style-type: none"> 1. Include protection of valued cultural facilities (para. 92 NPPF); 2. Policy 7.1 is restrictive and not in accordance with NPPF and the revised Use Class Order. Greater flexibility is essential to enable vibrancy and viability. In store retail is declining exacerbated by the pandemic; leisure uses should not be restricted to a defined leisure area. 3. Both support for and objection to the deletion of the bullet point regarding landmark buildings at gateways to the city centre.
East Norwich	<ol style="list-style-type: none"> 1. Historic England have concerns: <ul style="list-style-type: none"> • regarding the impact on Carrow Abbey /Carrow Priory. • over the capacity of the East Norwich sites - detailed HIA is required to inform the development/allocation potential of the sites; 2. The Broads Authority suggest some modifications re. navigation, mapping and the combined approach to the East Norwich sites; 3. The area is a long-term prospect with a high level of constraints and a history of non-delivery. Evidence does not suggest that the sites will come forward. 4. The area includes a County Wildlife Site. Clear policy is required to assess the acceptability of proposals that will affect it. 5. Covid-19 has changed home buyers' priorities (seek outdoor space + rural locations). Question whether demand exists for 4,000 dwellings in the area.
Elsewhere in the urban area	<ol style="list-style-type: none"> 1. Over reliance on the Growth Triangle for delivery within the plan period; 2. Thorpe St Andrew has no new allocations despite the availability of sites; 3. The parish of Honingham has been inappropriately classified as Urban Fringe in association with Easton (Honingham is a rural village).
Distribution and delivery of growth	<ol style="list-style-type: none"> 1. The GNLP is overly reliant upon sites in the Norwich Urban Area, risking market saturation and slow delivery rates. 2. Numerous allocations (75%) have been carried forward from previous local plans and have a track record of not delivering, with no promoter or developer on board. Some have a reliance upon public sector funding + public sector intervention to remedy market failure. 3. Historic England have concerns re. housing figures - Heritage Impact Assessments are required to test and inform the capacity of sites. 4. Insufficient account has been taken of the decrease in retailing in Norwich, which provides for significant redevelopment to housing. 5. Suggested solutions to 1 to 3 above include: <ul style="list-style-type: none"> • New settlement/s; • More rural development.

Contingency	<ol style="list-style-type: none"> 1. The contingency site at Costessey is likely to be ineffective due to constraints. Multiple contingency sites should have been identified in a variety of locations and the trigger mechanism should be earlier than three years. 2. There is already saturation of allocation sites in the Norwich Urban Area, the contingency site compounds the issue. Under delivery would be better addressed through a more robust evidence-based supply and monitoring.
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Policy 7.2 Main Towns

Topic	Main Issues raised
Aylsham	<ol style="list-style-type: none"> 1. Opposition from the Town Council and residents about both the site allocations and the process for their selection, focussing primarily on the addition of the Norwich Road site (GNLP0596R) being an increase of 83% in new homes from Reg.18 to Reg.19. Arguments against the allocation of 550 homes include: <ul style="list-style-type: none"> • Pressures on infrastructure – on schools, doctors, highways, parking, water supply and sewerage; • The lack of public consultation, and engagement with the Town Council, between Regulation 18C and Regulation 19 is criticised. • The GNLP should be withdrawn and re-consulted upon. 2. Support from a development promoter in Aylsham for the policy as written being consistent with para. 72 of the NPPF.
Diss (with part of Roydon)	<p>Site promoters state that:</p> <ol style="list-style-type: none"> 1. Allocations in Diss are disproportionately low compared to other Main Towns; 2. Housing allocations, including for older people's housing, should not be devolved to the Neighbourhood Plan; 3. The GNLP should have addressed perceived highways constraints, as opposed to using this matter to limit growth in a highly sustainable town.
Long Stratton	<p>Land promoters argue that the existing strategic allocation may not be deliverable and the GNLP should include a trigger for a review of allocations if the funding bid for the bypass is unsuccessful.</p>
Wymondham	<ol style="list-style-type: none"> 1. Support from the promoters of Silfield Garden Village (SGV) for the approach as drafted limiting piecemeal 'edge' growth. SGV would enable: <ul style="list-style-type: none"> • protection the strategic gap between Wymondham and Hethersett and • mitigating recreational pressure on the Lizard County Wildlife Site by the provision of a new Bays River Park. 2. Challenges from promoters of sites on the edge of the town include: <ul style="list-style-type: none"> • 'mixed messages' with contingency sites included in Reg. 18C; • the low level of growth is contrary to the town's inherent sustainability and location on the A11 Cambridge to Norwich Tech Corridor; • further growth would be supported by improvements to water capacity proposed by Anglia Water and improved access to the railway station; • 'rolling over' the existing strategic gap policy to Hethersett without a new assessment is unsound; • the development strategy for Wymondham effectively ends by 2030 on the basis that most AAP allocations will be completed by 2026, with approximately 500 dwellings to be delivered beyond that date.

Policy 7.3 Key Service Centres

Topic	Main Issues raised
Various Issues	<ol style="list-style-type: none">1. Developers and site promoters suggest the distribution through the settlement hierarchy and/or within KSCs is disproportionate and Brundall, Hethersett, Loddon, Poringland, Reepham and Wroxham should have further allocations;2. Policy 7.3 does not provide for educational or care/retirement housing needs in Hethersett or support provision of sports facilities;3. Policy 7.3 should refer to the GI strategy rather than GI maps reproduced in GNLP strategy document;4. Mulbarton, Horford and Scole should be redefined as KSCs.

Policy 7.4 Village Clusters

Topic	Main Issues raised
Various Issues	<ol style="list-style-type: none">1. There are a number of objections to the production of a separate South Norfolk Village Clusters plan. Concern about conflicting policies, an increase in excess of the minimum 1,200 homes not being in accordance with the NPPF. As the spread of development in SN not known, the overall environmental impact has not been assessed;2. Insufficient mention or consideration of self/custom build;3. Too much growth in village clusters/objection to dispersal;4. Too little growth in village clusters, some of the increase in numbers between Regs. 18C and 19 should have gone to villages;5. Appraisal of settlement boundaries should be undertaken;6. Policy does not allow for growth and expansion of rural businesses, impact of Covid-19 not adequately assessed, approach to employment overly restrictive;7. Policy fails to prioritise rural brownfield sites;8. Objection to the classification of Horsford as a village cluster rather than a KSC.

Policy 7.5 Small Scale Windfall Housing Development

Topic	Main Issues raised
Various Issues	<ol style="list-style-type: none">1. The policy is not clear on how it will operate in general and in relation to self-build;2. The policy is contrary to other policies and aims of the plan to promote sustainable development. It promotes development in unsustainable locations which are not well related to services and promote car use and carbon emissions;3. The split between parishes for 3 or 5 dwellings is too crude and has monitoring and implementation issues;4. The policy does not deliver affordable housing (larger allocations would);5. Sites adjacent to groups of dwellings without a settlement boundary are isolated dwellings in the countryside and therefore contrary to the NPPF;6. The policy should allow for higher levels of growth e.g. 3 or 5 per site not per parish, or sites up to 9;7. The "First past the post" approach is unworkable and is not sound;8. The policy does not support rural growth;

	9. Windfall and homes achieved from policy 7.5 should not be included in Table 6.
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Policy 7.6 – Preparing for New Settlements

Topic	Main Issues raised
Various Issues	<ol style="list-style-type: none"> 1. The policy pre-determines work that has yet to take place on the future distribution of growth; 2. There is no evidence that sustainable extensions to existing settlements have been exhausted; 3. Evidence from elsewhere demonstrates that new settlements struggle to provide affordable housing, particularly in their early stages; 4. There is a need for extensive evidence on viability, deliverability and infrastructure requirements; 5. There is a need for landscape character and heritage impact assessments (Historic England); 6. There is a lack of and need for consultation and engagement; 7. New settlements should be allocated now as they are more deliverable than some allocations.

Appendices

Topic	Main Issues raised
Appendix 1 - Infrastructure	<ol style="list-style-type: none"> 1. Sewage treatment in Aylsham - there should be a clearer plan to address capacity shortfall before any housing development; 2. There is a shortfall of provision in all aspects of health care; 3. Police infrastructure requirements (based on forthcoming evidence) should be included in Appendix 1, with a cross reference to Policy 4; 4. No infrastructure needs have been identified for Hingham, despite the cumulative impacts of development in the town.
Appendix 2 – Glossary	<ol style="list-style-type: none"> 1. Definitions for Listed Building, Local List and Registered Park and Gardens are required. 2. Change Scheduled Ancient Monument to Scheduled Monument.
Appendix 3 - Monitoring	<ol style="list-style-type: none"> 1. The plan is not carbon audited. It is not in line with the Climate Change Act (2008) as required by national policy and guidance; and is unsound in relation to the duties around mitigation; 2. The GNDP councils are significantly behind many leading authorities which have developed binding policies requiring new development to be net zero carbon, reducing carbon emissions in relation to retro-fitting buildings, energy generation and transport.
Appendix 6 – Housing Trajectory	<ol style="list-style-type: none"> 1. A site-by-site list showing the anticipated delivery of housing to evidence the trajectory is needed. 2. The divorcing of the village clusters plan from the GNLP means there is no evidence of the 1,200 homes expected from this part of the plan being deliverable.

2. The Sites

Introduction

- Lack of Heritage Impact Assessments. Insufficient information about the historic environment to support allocations, assessments don't follow Historic England methodology;
- Objections to separate South Norfolk Village Clusters plan.

Norwich

General Comments:

- Cllr Lesley Grahame and Green party representations suggest that: "Whole life cycle carbon analysis is necessary for new development to be sound and meet Climate Change Act legal target" for a number of sites within Norwich.

Policy CC2, 10-14 Ber Street:

- Historic England suggest key listed buildings affected by the development should be referenced. Policy wording should also reference 'Area of Main Archaeological Interest'

Policy CC4a, Rose Lane and Mountergate, land at Mountergate West:

- Anglian Water suggest additional policy criteria on existing surface water sewer on site.
- Cllr Lesley Grahame suggests that Rose Lane community garden should be a green space allocation. Employment welcome but must be compatible with high density residential.

Policy CC4b, Rose Lane and Mountergate, land at Mountergate East:

- The landowner's agent objects to the policy approach to the privately owned designated open space and the approach to landmark buildings. They also seek amendment to the uses on site to include a care home and remove educational facilities.
- Broads Authority request inclusion of early consultation with them in supporting text.

Policy CC7, King Street/Hobrough Lane includes 125-129 King Street and 131-133 King Street and Hoburgh Lane:

- Suggestion from landowner that policy should include criteria for viability appraisal at application stage due to difficult site constraints. Also requests acknowledgement of Norwich City Council's role in providing riverside access.
- Historic England require archaeological assessment to be included in policy criteria.
- Cllr Lesley Grahame suggests that the development must protect existing trees on site & provide proposed river access and walk.

Policy CC8, King Street, King Street Stores:

- Historic England suggest additional policy criteria requiring trial trenching prior to development.
- Policy intention to recreate historic streetscape should be replaced with priority to retrain the mature trees lining the boundary of the site (note that trees have TPOs).
- Cllr Lesley Grahame, Norwich Green Party and Historic England support retention of locally listed buildings on site.

Policy CC10, Land at Garden Street and Rouen Road:

- Policy criterion 1 & 2 are exactly the same, the repeated second point should be deleted.

Policy CC11, Argyle Street:

- Historic England suggest Archaeological Investigation requirement should be included in the policy criterion.

Policy CC15, Lower Clarence Road, car park:

- Policy should list nearby statutory listed buildings.
- Existing trees and hedges should be retained.
- Clause 2 is unclear regarding what is meant by ‘built frontages’.

Policy CC16, Kerrison Road: Land adjoining Norwich City Football Club north and east of Geoffrey Watling Way:

- Site promoter does not support provision of a public transport interchange on site and a public transport strategy for the wider east Norwich strategic regeneration area, but would support wording change to: *“Facilitate potential for enhanced pedestrian and public transport access to the wider Norwich strategic regeneration area”*.
- Cllr Lesley Grahame would like to add 2 further points – re-opening of train halt at Trowse + provision of open amenity space.
- Clarification required relating to numbers as there are consents on this site.
- Policy relating to river frontage relates to elements that have now commenced on site.
- Broads Authority suggest early engagement with them is added to supporting text.
- Approach to car free/low car housing should be consistent throughout relevant allocation policies.

Policies CC17 a and CC17b, Land at Whitefriars, Barrack Street:

- Sites referenced CC17a and CC17b are not being carried forward under these boundaries/policies. They have been replaced with GNLPO409AR and GNLPO409BR. It is assumed that the representation made here relates to the new site references: *“This is acceptable and welcomed, subject to social housing, environmental standards and traffic neutrality that make the plan consistent with climate and planning legislation”*

Policy CC18 (CC19), Oak Street and Sussex Street:

- Historic England suggest reference to the Area of Main Archaeological Interest and requirement to produce an archaeological assessment are included in policy criterion.

Policy CC24, Bethel Street, land rear of City Hall:

- Historic England suggest reference to the Area of Main Archaeological Interest.

Policy CC30, Westwick Street car park:

- Historic England - need for a policy requirement for archaeological assessment.

Policy R1, The Neatmarket, Hall Road:

- Promoting agent suggests greater flexibility of use classes in spirit of new class E; also, that wording relating to junction improvements should revert to that in existing policy.

Policy R13, Gas Hill, Site of former Gas Holder:

- Norwich Green Party and Cllr Lesley Grahame advocate retaining this site as woodland for biodiversity and climate objectives given the acknowledged constraints of the site.

Policy R17, Dibden Road, Van Dal Shoes and car park:

- The site promoter objects to the criterion relating to retention/reuse of existing buildings. Wording requiring '*high quality, locally distinctive design*' repeats requirements of strategic policies & places undue emphasis on this site which is misleading.

Policy GNLP0068, Duke Street, land adjoining Premier Inn and River Wensum:

- Historic England suggest inclusion of reference to Area of Main Archaeological Interest.

Policy GNLP0133BR, Land adjoining the Enterprise Centre Earlham Hall (walled garden and nursery):

- Historic England suggest a Heritage Impact Assessment is required for the whole campus.

Policy GNLP0133C, Bluebell Road (UEA, land north of Cow Drive):

- Anglian Water - existing water mains on site, suggest inclusion in policy.

Policy GNLP0133DR, Land between Suffolk Walk and Bluebell Road:

- Public objection to loss amenity open space and biodiversity. Impact on Yare Valley and wildlife. Impact of increased student numbers on local infrastructure and amenities.

- Historic England suggest a Heritage Impact Assessment (HIA) is required for whole campus.
- Comprehensive objection from Yare Valley society – allocation is contrary to national and local policies, the area is protected by the current local plan; Yare Valley is a priority Green Infrastructure project in the Greater Norwich Infrastructure Plan.

Policy GNLP0133E, UEA Grounds Depot:

- Public objection to loss amenity open space and biodiversity. Impact on Yare Valley and wildlife. Impact of increased student numbers on local infrastructure and amenities. Suggest allocation removes building works in this area to protect green corridor of the Yare Valley.
- Support from Environment Agency as development is sited in Flood Zone 1 area of allocation site & is in accordance with SFRA & previous EA comments.
- Support from site promoter subject to suggested changes to be more flexible regarding scale and massing of allowed development & difficulty in achieving cycle & pedestrian connections to sites outside of their ownership.
- Comprehensive/substantial objection from Yare Valley society – allocation is contrary to national and local policies as well as inconsistent with strategic policies of the GNLP; the area is protected by the current local plan; Yare Valley is a priority Green Infrastructure project in the Greater Norwich Infrastructure Plan.

Policy GNLP0401, Duke Street, former EEB site (Dukes' Wharf):

- Minor typographical/wording suggestions from Broads Authority.
- Support from Environment Agency and Historic England.
- Additional criteria relating to existing water main suggested by Anglian Water.

Policy GNLP0409AR, Land at Whitefriars:

- Support from Environment Agency – ‘text does not acknowledge that the site is in future Flood Zone 3a but flood risk issues should be able to be addressed on a site specific basis’.
- Additional criteria relating to existing surface water sewer suggested by Anglian Water.
- Suggested revisions to/re-ordering of policy wording by Historic England. Suggest inclusion of reference to Area of Main Archaeological Interest. Suggest a Heritage Impact Assessment is required for this site.

Policy GNLP0409BR, Land at Barrack Street:

- Additional criteria relating to existing surface water sewer suggested by Anglian Water.
- Suggested minor revision to policy wording by Historic England. Suggest a Heritage Impact Assessment is required for this site.

- **Objection from Site promoter** - Mixed use requirement is not evidenced to be viable or deliverable, the allocation is inconsistent with strategic policies. The inconsistency of parking policies between local authority areas throughout the plan undermines the attractiveness of City sites for business/employment uses. Suggestion that the site boundary is not correct (*however, boundary is in accordance with site promoter's reg 18C representation*). Sustainability Appraisal is misleading as it refers to expired consents for this site. Site promoter has provided suggested alternative allocation policy wording.

Policy GNLP0451, Queens Road and Surrey Street, land east of Sentinel House:

- Objection from site promoter on behalf of developer – the site has extant consent for student accommodation due to commence on site summer 2021. The site allocation policy is considered unsound for three reasons: i) Unjustified and ineffective heritage requirements. ii) Unjustified and ineffective approach to affordable housing. iii) Unjustified and ineffective approach to landscaping and biodiversity. (Suggested revision to policy wording to make sound provided by agent)
- Minor alterations to wording and reference to the Area of Main Archaeological Interest into the policy suggested by Historic England.

Policy GNLP0506, Anglia Square:

- Agent on behalf of site developer – suggests that the site boundary should be extended to include the area underneath the flyover. A comprehensive suggestion for revised supporting text has been provided by the agent. The agent has also suggested a comprehensive review of the allocation policy wording.
- Additional criteria relating to existing water mains, foul and surface water sewers suggested by Anglian Water.
- Significant concerns raised by Historic England relating to scale height and density. Suggestion that the allocation figure should be reduced from the current 800 to 600. Aside from housing, the permissible extent of other development on site is unclear. A Heritage Impact Assessment (HIA) should be prepared for the site. Suggested reinstatement of historic street pattern and suggested wording revision provided to policy.
- Comprehensive objection from Norwich Green Party – consider the policy repeats the same elements which lead to a lack of public support for the rejected scheme. 800 homes should be a maximum and this figure should include any potential student accommodation. Objection raises issues relating to: existing artistic community, provision of multi-storey car park/carbon emissions, more ambitious energy efficient design, landmark building. Proposal should reflect medieval street pattern, reference green open space and high-quality landscaping; low car environment.

Policy GNLP1061R, Land north of Norwich International Airport, Imperial Park:

- Historic England suggest reference to nearby Horsham St Faith Conservation area and heritage assets is made within policy.
- Site promoter on behalf of site owner supports an allocation subject to changes to policy requirements. Site boundary to be extended to include land at Petans, policy needs to provide a mixture of aviation and non-aviation uses in line with endorsed airport masterplan (current policy wording is inconsistent and overly restrictive). Ancillary uses should also be allowed to make site more sustainable.

Policy GNLP2114, Muspole Street, St Georges Works:

- Objection from site promoter. 110 homes, 5,000 sqm offices/managed workspace and potentially other ancillary uses is not achievable. Revised wording suggested.

Policy GNLP3054, Duke Street, St Marys Works:

- Historic England suggest that a detailed HIA is prepared for this site. Minor amendment of policy wording and reference to the Area of Main Archaeological Interest into the policy suggested.
- Site promoter objection – number of homes should not be ‘minimum’ but ‘in the region or order of’. The requirement to justify the housing type against a local community need is not considered to be justified or consistent with national policy. Suggestion that policy is amended to allow full or part retention of the locally listed building. Suggested revision to policy wording provided in representation.

East Norwich Strategic Regeneration Area

- Protecting wildlife and heritage sites, and water storage for the event of flooding will be critical the success or otherwise of the project.
- Opportunity to provide pedestrian and cycle links to Whitlingham enabling reduced carbon emissions through sustainable modes of transport.
- Introduction of a road bridge to Yarmouth Road would change the quiet suburban character of Thorpe, add noise and pollution, reduce air quality. It would threaten marshland biodiversity and water storage capacity, and reduce the amenity of the river Wensum, thereby undermining the River Wensum Strategy and conservation areas.
- Resident consultation is vital in the design and development of this new site.
- Low car development would reduce harm. Energy efficiency standards should reflect the best aspirations.
- Suggest opening former rail halt at Trowse to serve ENSRA & County Hall + bus connections to UEA, NRP & N+N Hospital.
- Potential impact of ENSRA on Whitlingham Country Park should be mitigated by extending the country park to cater for increased demands.
- The area is prone to flooding and development will need to mitigate against this risk.
- Any energy generation should be from recognisably clean sources (not combustion).

- Policy map should show area of utilities site in the Broads Local Authority area (allocated in their adopted local plan)
- The functioning of existing Carrow Yacht Club should be protected in the policy.
- The presence of County Wildlife Site does not preclude development, and this should be made clear in the allocation policy.
- Environment Agency *"Whilst we are able to find this allocation sound, there is no mention of the need to preclude development on a large part of GNLP0360 due to being Flood Zone 3b, and there is no mention on the need to not increase flood risk elsewhere and therefore provide flood storage. There is lots of mention of 'flood resilient construction' when this tends to mean the buildings can recover from a flood, while we would require buildings to have raised floor levels to prevent them flooding in the first place. It is however possible that perhaps this is just differing terminology and the intention is the same as us. It is positive that the SFRA Site Summary Table includes lots of detail as to what is required to develop the site, so therefore this information should be covered here."*
- Historic England raise significant concern with the proposed number of dwellings allocated which may have a harmful impact on the historic environment (there are numerous heritage assets on this site). Strongly advise that a HIA is prepared for ENSRA sites. Some suggested amendment to wording has been provided by Historic England.
- Dentons suggests that the viability and therefore deliverability is not sufficiently evidenced. This should not be deferred to an SPD stage. The requirements of the ENSRA SPD have not been adequately established in policy 7.1 and site allocation GNLP0360/3053/R10. This relates to the scope, timing and scale of the masterplanning process and whether elements of it are Justified and will be Effective.
- Rosconn Group – No evidence that ENSRA will realistically yield this level of development in GNLP plan period. Significant Infrastructure requirements and flood risk indicates that site is more appropriate for long term than medium-long term. L2SFRA indicates areas of land in floodplain likely to affect amount of land available for development & mitigation needed. But no sequential test evidence is provided to demonstrate selection of these sites instead of sites elsewhere.

Norwich Site Assessment Booklet:

- Site GNLP0478 (Land east of Green Lane West) has not been allocated due to Highways related reasons – it is suggested that an engineered solution could be found & that the site should be allocated.
- Land allocated at Colney Hall is misleading to allocate the entire area as it contains historic parkland that should not be developed & which is outside of the development boundary.
- Cringleford Parish Council challenges the GNLP's Regulation 19 proposals for the Parish of Cringleford. The number of homes allocated does not respect the figure of 1,200 in the adopted Cringleford Neighbourhood Plan. The GNLP has ignored comments of the Parish made under Regulation 18 and is proposing a 32% increase

over planned residential dwellings without providing evidence of need for the additional housing in Cringleford. Challenge that the plan meets the criteria of compliance with duty to cooperate (disregard of neighbourhood plan & parish council comments to previous consultations).

- Historic England suggest site assessments appear to be lacking. The assessments do not follow the 5-step methodology set out in HE advice note 3. They do not properly consider the significance of the heritage assets, the impact of development upon the significance of those assets and do not consider mitigation and enhancement. This is of particular concern for sites where additional HIA was recommended at reg 18 but has not been carried out. Concerns regarding the indicative capacity of a number of sites. HE considers that Norwich's historic character is under pressure. we consider that it is essential evidence base document is prepared outlining the site capacities and the assumptions that have been made in reaching these figures, particularly for the sites in the City.

Urban Fringe

- **Historic England** - The changes made to Site Policies in view of comments made at Reg 18 are welcomed. Continue to advise that **Heritage Impact Assessments (HIAs)** should be prepared in advance of the EiP. This applies to Colney Hall GNLPO253 in particular.
- **Costessey** - COS3/GNLPSL2008 (Overwood Lane) changes to Settlement limit suggested.
- **KES2 employment site** has the capacity to deliver in the region of 30, 000 sq. meters of employment floorspace so expansion suggested.
- Further evidence of Housing Need is required to justify increase in numbers at **Cringleford** in relation to NP and site allocated with uplift.
- **Showground, Costessey** COS5/GNLPO274
 - amendments suggested to include small restaurants, café, PH, etc.
 - retail and leisure will add greatly to the over stretched local road network and contradicts Policy 2 of Neighbourhood Plan.
- The site at **Farmland Road, Costessey**, offers an appropriate opportunity to deliver growth in a manner that is appropriate.
- **Drayton Site DRA1** - Carried Forward Sites / Planning permissions / GNLPO Policy Requirements require update to reflect permissions.
- **Drayton – GNLPO290** (unallocated) Recommended changes to Policy 5 to enable viability of care homes, and Policy 3- as it does not specifically refer to CWS - proposed amended text to set out a clear benefit a development can provide, such as a 10% biodiversity net gain.
- **Taverham site 0337R** should include Police Station Norfolk Constabulary / NPS (DTC)
- **Code Developments** – (Horsford) on behalf of Drayton Farms - The plan has failed to justify through proportionate and consistent evidence the selection of allocated site GNLPO337(Taverham), identified contingency site GNLPO2043/0581 and the rejection of Reasonable Alternative sites **GNLPO332R and GNLPO334R (Hellesdon**

north) as site assessment is not transparent. Legal opinion obtained. Additional medium sized site allocations should be identified in order to reduce the over-reliance of the plan's supply of housing on large-scale development sites. Site HEL4/GNLP1019 allocated for Open Space should be deleted and considered for housing under sites GNLP0332R and GNLP0334R instead.

- **Code Developments** – Hellesdon (on behalf of Jarrolds) – objects to Site Assessment and outcome of not allocating clients' Site GNLP2173 – for Housing. There are inconsistencies in Site Assessment and SA Report approach taken between HEL1 'carried fwd sites' and 'new sites' GNLP2173.
- **Easton PC** – DTC – Easton EAS 1: - objection to the additional 90 dwellings on the last parcel of allocated land, to the east of Easton Gymnastics Club.
- **Lanpro** – Rackheath – GNLP2166 should be allocated for 200 dwellings as unlikely to impact to Rackheath Hall unlike GNLP0132
- **La Ronde Wright** - Sprowston – New site promoted - west of Blue Boar Lane near garden centre - unallocated in the GT AAP
- **Bidwells** Sprowston - GNLP0132 – Request flexibility on affordable housing requirement due to infrastructure requirements for High School and additional requirements by AW for pumping station to serve the surrounding area.
- **Sprowston** - Request that GNLP3024 is allocated for mix and community uses to complement nearby housing developments.
- **Norfolk Wildlife Trust** – Sprowston - recommended text modification to site GNLP0132 adjacent to Ancient Woodland -GI requirement
- The **SFRAs** done are defective as maps have not been followed through properly. With regards to the NEG, massive development has been approved within a massive flood plain that is close to sea level and where tidal effects are observable for miles.
- **Broads Authority**- recommended text for clarity for Policy 3 with respects to the built and historic environment. heritage impact assessment is required by government guidance for any application that affects any heritage asset or their setting.

Main Towns

Aylsham

- Substantial objections from 65 residents, as well as Aylsham Town Council, concentrating on the addition of GNLP0596R, and the increase in housing requirement to 550 new dwellings, without further consultation prior to progressing to the Regulation 19 stage. The soundness of the GNLP is challenged, in respect to its evidence and justification for the housing allocated. Issues include the demand on infrastructure such as highways and education provision, and sewerage capacity.
- An objection from the promoters of site GNLP0336 west of A140 argues for the inclusion of their site - the assessment process failed to take account of a variation of their proposal that would provide 150 homes instead of 300 homes.

- In relation to GNLP0596R on Norwich Road the promoter has reiterated their support for the site's allocation, whilst clarifying that the policy should be amended to exclude pedestrian connections via Copeman Road. Historic England raises the potential impact on the nearby Grade II Diggins Farmhouse. A minor modification put forward by Anglian Water is to amend the policy wording to allow for access to maintain the foul drainage infrastructure running through the site.
- In relation to GNLP0311/0595/2060 on Burgh Road the promoter has reiterated their support for the allocation, whilst suggesting minor modifications to reduce the carriageway width, and to clarify that their obligation is to provide land for the school (and not the school itself). A minor modification is put forward by Anglian Water to safeguard access for the maintenance of the water supply, foul and surface water drainage infrastructure that runs through the site.

Diss

- Objections from promoters that focus upon the strategic growth figure for Diss, and the devolution of site allocations to the Neighbourhood Plan. Sites in question include: DIS1, DIS3, GNLP0250/0342/0291, GNLP0599, GNLP1044, and GNLP1045.
- Diss Town Council state that a footway/cycleway is required as part of GNLP01022 (Frontier Site) northwards towards to join Frenze Hall Lane.

Harleston

- Minor modifications are put forward by Anglian Water to allocation policies GNLP2108, GNLP2136, HAR 4, HAR 5, and HAR 6 to safeguard access for the maintenance of the water supply, foul and surface water drainage infrastructure that runs through the sites.
- A development promoter wishes to see the settlement boundary to the south of Harleston redrawn around GNLP2109 and GNLP2136.

Hethel (Strategic Employment Area)

- The settlement boundary should be updated, reflecting changes such as the development of the Classic Team Lotus building.
- Norfolk Wildlife Trust states that policies should specifically address potential impacts on the County Wildlife Site and ancient woodland from impacts including encroachment and light pollution.
- Historic England state that policies should mention the impacts on nearby Grade II listed Little Potash/Brunel House and Corporation Farmhouse.
- Promoters on behalf of Goff Petroleum object to the non-allocation of their site for a new energy research centre (site reference GNLP0116R).

Long Stratton

- The strategic approach to Long Stratton should be changed, with promoters arguing for inclusion of their site GNLP0354, GNLP4033, and GNLP4034.

Wymondham

- The strategic approach to Wymondham should be changed, with promoters arguing for inclusion of their sites GNLP006 (north Wymondham) and GNLP0320 (south of Gonville Hall Farm).

- A generic comment from the Environment Agency for all Wymondham site allocations states that the latest version of the Water Cycle Study shows that Wymondham Water Recycling Centre will be over capacity post growth. The latest findings and recommendations from the WCS should be incorporated and reflected in the Local Plans and Site Allocations.

Key Service Centres

- Broads Authority would like dark skies consideration inserted into Acle site policy;
- Acle site promoter wants additional policy requirement for phasing plan for road;
- In Acle, Brundall, Hethersett, Hingham, Loddon, Anglian Water requests additional policy and supporting text elements in some sites with underlying water assets;
- Developers and site promoters suggest sites in Blofield should be allocated/included in settlement boundary;
- Pigeon proposed a school on GNLP0352 in Brundall, but this use was not assessed;
- Brundall BRU2 Unsound to allocate for open space as housing permitted and development has commenced;
- Page 40 of Hethersett site assessment booklet contains an error in that the site descriptions have been set under the wrong heading;
- Site GNLP0503 in Hingham has been withdrawn during Reg19;
- GNLP0520 Hingham Site policy for surface water only deals with site, not lower surrounding areas;
- Chedgrave PC considers duty to co-operate has been failed, entire process has been inadequate re involvement of public.
- Richard Bacon: Plan does little to address education needs in Poringland. NCC has need and funding allocation for primary school in Poringland, plan should address this.
- Reepham GNLP0353R in 2019 use changed to include employment land 1.6ha (as well as housing and potential expansion of GP). Part 1 booklet neglects to mention employment. Rep has not been taken into account when selecting sites contrary to reg 18(3) which requires all reps taken into account. Reg18C rep repeated employment, and submitted access strategy. Highways view unchanged. (NB site booklet did not include employment in table stage 1 (part 3, post-reg18c) but correct description in stage 4.)
- Reepham REP1 allocation is not deliverable, as evidenced by application 20200847, viability information of which shows 141 homes, only 20% affordable housing, and sports hall on alternative site (stated by developer).
- Unsound not to allocate housing in Poringland, partly due to dispersal strategy. Commitment has reduced as housing has been delivered in the village. GNLP0494R is suitable, available, deliverable. Site access given as constraint, but access was not disputed by Highways Authority in recent application 2017/2871. For GNLP0485R, **failed to consider school and country park while pressing need for school in Poringland and GI in Greater Norwich**. Highways Authority have not considered evidence submitted during Reg18C.

- Hingham booklet: contradictions in site assessments, decisions on some sites are flawed, not based on proportionate evidence. Highway Authority evidence is disputed, mitigation afforded to allocated sites could be applied to other sites. No reference to town centre. Conclusion in booklet justifies predetermined decision to allocate 0520.

Broadland Village Clusters

- Anglian Water objections regarding assets within the boundary of allocated sites, requesting new text and policy requirement (BLO5, 0297, FOU2, 0264, HNF1, 0188);
- Foulsham – significant opposition focussing on issues of historic hedgerow and access;
- Horsford – recent flooding being investigated by NCC;
- Horsham St Faith – increase in numbers without consultation, Historic England objection – request for HIA;
- Lingwood – introduction of 4016 without consultation;
- Marsham – alternative site 3035, Historic England objection – request for HIA;
- Lack of allocation in Great and Little Plumstead cluster;
- Reedham – lack of consistency – no safe route to school;
- South Walsham – potential change of access point.

Non-Residential

- Policy BKE3 -- Brooke Industrial Estate – Norfolk Wildlife Trust request policy update to include an ecological assessment to reflect proximity to Atlas Gravel Workings CWS.
- **Review of strategic gaps** required. The promoter of GNLPO177-BR has completed an initial assessment for the Hethersett- Cringleford strategic gap. They argue that development can be accommodated without resulting in coalescence between the two settlements.

Costessey Contingency Site

- **Historic England** – A Heritage Impact Assessment be undertaken.
- **Code Developments** – Additional contingency sites should be identified.
- **Barton Wilmore** – As the site can deliver educational land at the beginning of the period it should be a full allocation. Revisions to site policy include 977 dwellings @35 dph.
- **Client Earth** - Site could contribute towards the urbanisation of countryside.
- **Various sites** suggested for allocation instead of having a contingency site.

3. Evidence Studies

Equalities Impact Assessment

- Highway safety concerns (Raised by Hingham Town Council – specific to Hingham)

Green Infrastructure Study

- Hingham Conservation area is out of date, the boundary was revised in 2016.
Need to know if any other boundaries used are out of date.

Gypsy and Travellers

- The Gypsy/Traveller Accommodation Assessment is flawed, failing to take proper account of need and supply;
- Accusations of improprieties in planning overall leading to extensive breaches of Human Rights and Equalities legislation.

Habitat Regulations Assessment (HRA)

- Not legally compliant – HRA incomplete.
- Not sound – inadequate evidence to demonstrate that no adverse effects on European Sites (incomplete HRA) (both Norfolk Wildlife Trust).

HELAA

- Incorrect HELAA assessment of sites at Coltishall and Silfield Garden Village

Statement of Consultation

- Lack of Reg 18d consultation for people to have their say
- SNC SCI not complied with and consultation not on the 'Have your Say' page of the SNC website

Strategic Flood Risk Assessment

- Fundamental concern with the production and use of FRAs and SFRAs for development sites – not just locally, but nationally;
- A single map linking the all groundwater flood susceptibility areas in GNLP and one for Surface Water flood areas would give a holistic picture for these matters in the GNLP area;
- It is surprising that maps showing the extent of major floods have not been produced;

- It would be informative if planners published information on the number and location of flooded properties in their area in the last 50 years and the dates when these properties were built;
- Allocation of site on land north of Tuttles Lane East, Wymondham (currently unallocated) is suggested would alleviate flood issues related to the river Tiffey.

Sustainability Appraisal

- Spatial strategy is not justified – other reasonable alternatives have not been properly appraised;
- SA is flawed in its assessment of specific sites and consideration of alternatives (inc strategic alternatives e.g. Hethersett / Cringleford, Silfield Garden Village proposal, Long Stratton);
- SA findings support a different approach to site allocation – avoiding as far as possible new development on greenfield land and in unsustainable locations (e.g. KSCs and villages);
- Contingency sites not justified (based on size and not speed of delivery);
- Carried forward allocations have not been treated comparably with other sites (no evidence or proper assessment);
- SA is inadequate in terms of carbon assessment and addressing climate change.

Viability Study

- Benchmark Land Value (BLV) -- £100,000/acre is not justified. The £348,000/acre adopted in the 2017 Hamson CIL is fully supported by a respondent.
- Typology 11 (strategic sites) – the gross to net areas assumption is unrealistic. To achieve 88% net to gross site area on a Typology 11 development is not practical or feasible in reality.
- Revenue Assumptions are not sound – concern exists that the private sale revenues assessed in the Viability Appraisal remains excessive. Using the housebuilder's actual sale prices (all of which are publicly accessible on Land Registry), the range of values recorded was £1,866/m² to £3,634/m².
- Developer Profit on Gross Development Value (GDV)– the reduction from 20% to 17.5%. The reduction in developer profit is un-justified.
- Build costs for apartments –the appropriate BCIS rate should be applied.
- The Viability Appraisal does not include a typology to fit the East Norwich Strategic Regeneration Area and specific viability appraisals for strategic sites are not provided.
- Sales-values, build costs and benchmark land values are too generic and not backed up by comparable evidence.

Water Cycle Study

Summary of main issues raised:

- Not legally compliant – WCS incomplete and so insufficient evidence to meet Habitat Regulations
- Not sound – WCS incomplete so insufficient evidence on water quality to show no impacts on SACs (both Norfolk Wildlife Trust).

PENSIONS DISCRETION POLICY

Report Author: Emma Hodds
Chief of Staff
01508 533791
emma.hodds@broadland.gov.uk

Portfolio: Transformation and Organisational Development

Wards Affected: All

Purpose of the Report:

The Council is required by law to create a pensions policy in relation to the discretions under the Local Government Pension Scheme. This policy is linked to the One Team terms and conditions and it is appropriate for the same pensions discretions to be awarded.

Recommendations:

Cabinet to approve:

1. The Councils Pension Discretion Policy.

1. Summary

- 1.1 The Council is required by law to create a pensions policy in relation to the discretions under the Local Government Pension Scheme. This policy is linked to the One Team terms and conditions and it is appropriate for the same pensions discretions to be awarded.

2. Current position

- 2.1 The Council has a legal responsibility to ensure that this policy is in place and up to date. The current policy has not been reviewed for some time; hence the policy being presented as a new policy.
- 2.2 As with all policies the discretions should be reviewed from time to time to ensure that current thinking is reflected. Any revisions should then be shared with the Norfolk Pension Fund to ensure correct interpretation and application where this might apply for the One Team.
- 2.3 In setting this policy, consideration has been given to:
- Cost – discretionary powers come with a cost attached and need to be affordable
 - The basis upon which decisions are made so that the policy is not rigid
 - Equality – thereby ensuring criteria does not discriminate and that decisions are justifiable
- 2.4 The policy has also been discussed with the Staff Consultation Forum, which includes UNISON representatives and staff representatives.

3. Proposed action

- 3.1 The policy, as attached at **Appendix 1** to this report, sets out in tabular format the employer discretion, the description of this, the associated regulation and how this will be applied in policy.
- 3.2 This approach makes it clear how each regulation will, or will not, be applied by the Council, thus ensuring that clarity is provided for all staff in such circumstances.

4 Other options

- 4.1 Not applicable in this regard as it is a legal requirement to have such a policy.

5 Issues and risks

- 5.1 **Resource Implications** – the policy has been drafted to ensure that the policy is affordable and is mindful of the use of public funds.
- 5.2 **Legal Implications** – the policy has been written in line with the regulations.
- 5.3 **Equality Implications** – the policy has been written to ensure that the criteria does not discriminate and that decisions can be objectively justified.
- 5.4 **Environmental Impact** – not applicable to this report.
- 5.5 **Crime and Disorder** – not applicable to this report.

6 Conclusion

- 6.1 Cabinet are requested to approve the attached policy as this is in line with the regulations and ensures that the Council are clear about the interpretation of the regulations.

7 Recommendations

- 7.1 Cabinet to approve the Councils Pension Discretion Policy.

South Norfolk and Broadland Councils Discretionary Policy Appendix 1

Introduction & Context

The Council is required by law to review or create a pension policy in relation to the discretions under the Local Government Pension Scheme.

In becoming One Team from January 2020 it is appropriate for the same pension discretions to be awarded to employees regardless of employer.

It is a requirement that the Councils policy shows the basis on which we would make decisions on various discretions. The government has advised employers should not 'fetter their discretion' i.e. policies should not be so rigid or restrictive as to prevent flexibility where a (possibly unanticipated) situation requires it. There are compulsory items which must be included as well as a number of non-compulsory items. It is recommended that non compulsory items are included in any published policy.

As with all policies the discretions should be reviewed from time to time particularly when other Council policies are updated/amended to ensure the discretions reflect current thinking. Any revisions should be published and shared with the Norfolk Pension Fund within one month of changes being made

Please be aware it's also a legal requirement for the Council to have regard to the extent to which the exercising of agreed discretions might lead to a serious loss of confidence in the public service.

Pension Discretions Applicable from April 2014

In setting and reviewing its discretion the Council has considered

- Cost – discretionary powers come with a cost attached – all Council policies must not lead to a loss of confidence in public services, therefore they must be affordable
- Basis on which decisions are made - policies should not be so rigid or restrictive
- Equality – criteria that do not discriminate and where decisions are objectively justified.

The Council has limited resources and needs to maintain a balanced budget therefore discretions are only exercised in exceptional circumstances

Mandatory Discretions as per Reg 60(1) of the LGPS Regulation 2013 and Reg 66(1) of the LGPS (Administration) Regulations 2007.

Employer Discretion	Description	Regulation	SNC/BDC Policy
Funding of Additional Pension	An employer may fund wholly, or in part, a member's additional pension contract. The payment can be paid by regular contributions or a lump sum.	16(2e) 16 (4d)	The Council does not make such voluntary contributions to members APCs
Awarding Additional Pension	An employer may increase a member's benefits by awarding additional pension up to a maximum of £6,500 p.a. from April 2014. This amount is subject to an annual increase each April.	31	The Council does not make such voluntary contribution
Flexible Retirement	An employer may give consent for a member aged 55 or more who reduces their grade or hours of work (or both) to receive all or part of their LGPS benefits immediately, even though they haven't left its employment.	30(6)	<p>The Council will consider each flexible retirement case on its merits where an employee has reduced their hours by at least 25% and/or their salary. Please refer to the agreed Retirement Policy for further details.</p> <p>Under normal circumstances the Council will not fund any additional strain costs.</p>
Waiving of Actuary Reduction	If the benefits payable on retirement before normal pension age would normally be reduced for early payment, the employer may agree to waive all or part of the reduction.	30 (8)	The Council will not waive any actuarial reduction in normal circumstances

Early Payment of Pension: Regulation 30 LGPS (Benefits, Membership and Contributions) Regulations 2007 (Two decisions to be made)	<p>An employer may give consent for a member aged 55 or more who has left its employment prior to April 2014 without an entitlement to immediate LGPS benefits to receive them straight away regardless.</p> <p>If the benefits payable would normally be reduced for early payment, the employer may agree to waive all or part of the reduction.</p>	30	<p>In normal circumstances the Council will not agree to the early release of pension benefits</p> <p>In normal circumstances the Council will not authorise the waiving of all or part reductions due to early pension release.</p>
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Non-Mandatory Pension Discretions

Employer Discretion	Description	Regulation	SNC/BDC Policy
Membership Aggregation	A member who transfers from another LGPS employer, either directly or after a break, must have their two periods of membership aggregated provided they do so while still an active member in the new post. The member has twelve months from the aggregation to opt to keep their periods of membership separate.	22(7b) (8b)	The Council do not extend the normal time limits, except in exceptional circumstances where it may be reasonable i.e. there is evidence that an election was made but did not reach the Pension Fund in time.
Shared Cost AVCs	An employer may contribute towards a Shared Cost AVC Scheme, i.e. an	17(1)	The Council do not contribute to any shared cost AVC.

	AVC Scheme into which the employer pays contributions as well as the member.		
Forfeiture of Pension Rights	If a member leaves as a result of a conviction for an offence in connection with their LGPS employment or as a result of their own criminal, negligent or fraudulent act in connection with that employment, the employer has discretion (within the terms of these three regulations) to direct all or part of their LGPS pension rights should be forfeited and / or paid over to the employer or specified dependants of the member.	91, 92, 93	The Council will consider each case individually should this situation arise
Appointment of Adjudicator for Member Disagreements	<p>There is a three-stage dispute procedure for members who disagree with any LGPS decision made by their employer. The first stage is handled by the employer.</p> <p>Employers must appoint an Adjudicator. You may appoint internally or externally. In every notification of any decision made under the Regulations must inform the person concerned of the job title and address of the person appointed under</p>	74(1)	In the event of any disagreement the Council would follow the Dispute Procedure in operation at the time

	Regulation 74(1) to whom any application may be made for adjudication		
Transfers of Pension Rights	A member who has previous pension rights in a different pension scheme* may transfer them into the LGPS provided they opt to do so within twelve months of joining it.	100(6)	The Council do not extend the normal time limits, except in exceptional circumstances where it may be reasonable i.e. there is evidence that an election was made but did not reach the Pension Fund in time.
Members' Contribution Rates	Employers have to allocate members into the appropriate contribution band at the beginning of each financial year. If a member's pay moves into a different band during a financial year, the employer has discretion to implement the new band immediately but may prefer to wait until the next annual review	9(3)	The Council's Pensions policy explains how employee's contribution bands are assessed
Absence Contribution Time Limit: LGPS (Administration) Regulations 2008	A member who has been away from work prior to 31st March 2014 as a result of maternity, paternity or adoption leave, industrial action (mainly strikes) or unpaid leave of absence has the right to pay voluntary pension contributions to cover the period of absence. Their request to do so normally has to be made within 30 days	22(2)	The Council do not extend the normal time limits, except in exceptional circumstances where it may be reasonable i.e. there is evidence that an election was made but did not reach the Pension Fund in time.

	of returning to work (or within 30 days of their last day of service if they don't return).		
Membership Aggregation: LGPS (Administration) Regulations 2008,	A member who transfers prior to 1st April 2014 from another LGPS employer, either directly or after a break, may opt to aggregate the two periods of membership provided they do so while still an active member in the new post and within twelve months of joining	16(4)(b)(ii)	The Council do not extend the normal time limits, except in exceptional circumstances where it may be reasonable i.e. there is evidence that an election was made but did not reach the Pension Fund in time.

Non- Mandatory - Redundancy Discretions

Local Government (Early Termination of Employment) (Discretionary Compensation) (England and Wales) Regulations 2006 (as amended)

<u>Employer Discretion</u>	<u>Description</u>	<u>Regulation</u>	<u>SNC/BDC Policy</u>
<u>Redundancy Pay on actual weeks' pay</u>	To base redundancy payments on an actual weeks pay where this exceeds the statutory weeks' pay limit.	5	The Council will base redundancy payments on an actual weeks pay where this exceeds the statutory weeks' pay cap
<u>Lump sum compensation</u>	To award lump sum compensation of up to 104 weeks' pay in cases of redundancy, termination of employment on efficiency grounds, or cessation of a joint appointment.	6	For the period 1 st January 2020 to 31 st December 2021 the Council will multiply the number of weeks in the statutory redundancy table by 1.6.

			<p>From the 1st January 2022 the multiplication will reduce to 1.4 times the number of weeks in the statutory redundancy table.</p> <p>Please refer to the full Redundancy Policy for further details.</p>
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These discretions will be reviewed on a regular basis to ensure they remain applicable and appropriate.

**NOT FOR PUBLICATION BY VIRTUE OF SCHEDULE 12A OF PART 1
PARAGRAPH 3 OF THE LOCAL GOVERNMENT ACT 1972 (AS AMENDED) BY
THE LOCAL AUTHORITIES (ACCESS TO INFORMATION) (VARIATION) ORDER
2006 (contains information relating to the financial or business affairs of any
particular person (including the authority holding that information))**

Pages 170 to 244 are not available to the public because the information is confidential as it includes exempt information about the financial or business affairs of a person

CABINET

6 July 2021

Final Papers

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8	Place Shaping Policy Development Panel	246

DEMOCRATIC SERVICES

Broadland District Council

Thorpe Lodge, 1 Yarmouth Road, Norwich, NR7 0DU

Email: committee.services@broadland.gov.uk

PLACE SHAPING POLICY DEVELOPMENT PANEL

Minutes of a meeting of the Place Shaping Policy Development Panel of Broadland District Council, held on Monday 28 June 2021 at 6pm.

Committee Members Present:	Councillors: J M Ward (Chairman), N J Brennan, D G Harrison, K G Leggett MBE, I Moncur, G K Nurden, J L Thomas, D M Thomas
Other Members in Attendance:	Councillor: S Lawn (ex officio)
Officers in Attendance:	The Assistant Director Planning, the Democratic Services Officer (DM)
Also attending:	Mike Burrell – Greater Norwich Local Plan Team Manager

1 APOLOGIES FOR ABSENCE

An apology for absence was received from Cllr Harpley.

2 MINUTES

The minutes of the meeting held on 8 April 2021 were agreed as a correct record.

3 GREATER NORWICH LOCAL PLAN (GNLP) – SUBMISSION TO THE SECRETARY OF STATE FOR INDEPENDENT EXAMINATION

The Greater Norwich Local Plan Team Manager, Mike Burrell, introduced the report, which sought members' agreement to recommend Cabinet that the Council agrees to submit the Greater Norwich Local Plan (GNLP) to the Secretary of State for independent examination, subject to the caveats and delegations specified in the recommendation.

Mr Burrell advised members that the representations received arising from the Regulation 19 consultation had been reviewed and examined and, save for the matters specifically addressed in the recommendations, it had been concluded that they identified no significant issues that could not be addressed or were such a risk that the GNLP should not be submitted. He reminded members that the Regulation 19 consultation provided an opportunity for stakeholders to make

representations in respect of whether the Plan was legally and procedurally compliant, was sound, and was in compliance with the duty to cooperate.

Mr Burrell took members through each of the recommendations which had been considered by the Greater Norwich Development Partnership and received unanimous support.

With regard to recommendation 1, following representations from Natural England regarding visitor impact on internationally protected habitats, there was a need for an agreed Statement of Common ground prior to the submission of the Plan. Work was underway on seeking such an agreement and it was hoped this would be resolved in time for the submission by 30 July.

With regard to recommendation 2, whilst the Plan included policy provision for assessing applications for gypsy and traveller sites, no such sites had been submitted through the Plan making stage and failure to provide for the evidenced need through specific sites was a risk to the soundness of the Plan. There was therefore a need to proactively identify sites and work was underway in this respect. It was noted that the necessary provision equated to a need for approximately 68 pitches (4 sites) and early investigations had identified 1 potential major site and extensions to a number of exiting sites to meet the need.

Recommendations 3 and 4 were standard practice when submitting a Plan and dealing with any necessary modifications arising to ensure the Plan was sound and legally compliant. Any amendments put forward by the independent inspector would be subject to consultation.

With regard to the representations received, the main issues raised and likely to be the main areas of discussion related to housing numbers, locations, deliverability of sites, impact on climate change, transport, infrastructure, housing type and a number of process queries on specific sites for example Acle, Aylsham, Foulsham and Lingwood. In answer to a question, members' attention was drawn to the figures in the report for the number of responses received to the consultation: a total of 1316 representations had been made - 263 in support and 1053 objecting. All the representations received would be submitted to the independent inspector with the Plan. Mr Burrell reiterated that all submissions had been reviewed and he was satisfied that there were no significant matters which could not be addressed.

In response to a concern about the provision for Aylsham, Mr Burrell stated that objections received relating to the process had been considered and he was satisfied that due process had been followed. Housing numbers had been increased following the release of the Government's "Planning for the Future" document and, as part of the proposals to meet the increase, the additional site in Aylsham previously not included had subsequently been assessed and deemed a sustainable site and included in the Plan.

It was then proposed, duly seconded and

RESOLVED TO RECOMMENDED TO CABINET

To

1. Agree that the Greater Norwich Local Plan (GNLP) is sound and to submit the Plan to the Secretary of State for independent examination subject to reaching an agreement in principle with Natural England, in the form of a signed statement of common ground, in relation to the mitigation necessary to protect sites protected under the Habitat Regulations;
2. Commit to proactively identify and bring forward sufficient Gypsy and Traveller sites to meet identified needs in accordance with the criteria based policies of the current and emerging Development Plans;
3. Agree to request that the appointed independent inspector make any Main Modifications necessary to make the plan sound and legally compliant;
4. Delegate authority to the Assistant Director for Planning, in consultation with the Portfolio Holder for Planning, and in conjunction with Norwich City and South Norfolk Councils, to:
 - (a) agree minor modifications to the GNLP prior to its submission;
 - (b) negotiate any main modifications necessary to make the GNLP Sound as part of the Independent Examination.

(The meeting concluded at 6:30pm)

Chairman